



ESG report  
**2025**

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4ème de Couverture : tour fibrée Lannion, Agence [lalanterne.bzh](http://lalanterne.bzh)

We would like to remind that, under European Directive 2013/34/EU on sustainability reporting standards, as amended by Directive (EU) 2022/2464 (the Corporate Sustainability Reporting Directive, or CSRD) of the European Parliament and of the European Union Council, the Council of the EU has officially given the green light to the adoption of the so-called 'Omnibus I' Directive, which aims to simplify the obligations on companies arising from the CSRD. The text considerably restricts its scope. Indeed, only companies with a net turnover exceeding €450 million and which employ an average of more than 1,000 employees during the financial year, at group level (on a consolidated basis) where applicable, will be required to produce a sustainability statement from 2028 (reporting on the 2027 financial year). The 'Omnibus 1' Directive was published in the Official Journal of the European Union on 26 February 2026 and entered into force 20 days after its publication. As regards companies that will no longer be required to publish a sustainability report for 2027 in 2028, Member States have the option to exempt them from publishing such a sustainability report from the 2026 financial year onwards (publication in 2027).

**Given that the Group will fall outside the scope of the CSRD in two years' time at the latest (2027), or even in one year's time (2026 exemption), the Lumibird Group has decided not to publish a sustainability statement meeting the CSRD requirements for the financial year ending 31 December 2025, but to publish a voluntary report on ESG issues.**

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# Business Model

Lumibird aims to democratise laser technology by offering innovative and competitive products. The Group designs, produces and markets most of its products.

## Our resources

### Intellectual

**12**  
R&D sites

**173**  
R&D employees



### Human

**1,078**  
employees  
(headcount as at 31 decembre 2025)

**14**  
countries of operation



### Industrial

**10**  
production sites

**576**  
production employees



### Commercial

**10**  
sale subsidiaries

**188**  
employees



### Financial

**€61.6m** Gross Cash  
**€84.6m** Financial Debt  
**€43.5m** Acquisition debt able to be drawn



## Our Strategy

- Patent registration
- Low level of out-sourcing
- Internal manufacture of components

Employees in 14 countries for a better understanding of each market

Automation of production tools as part of a lean manufacturing approach

Marketing subsidiaries combined with over 150 distributors

Supporting business with resources to support external growth

## Ethics: CSR commitments



CSR / Purchasing policy and Code of conduct

Our subsidiary, LUMIBIRD PHOTONICS SWEDEN, has achieved a Silver rating in the internationally recognized EcoVadis ranking for sustainability and social responsibility.



## Our Strategy

## Added-value

Capitalising on skills and know-how within the Group



Intellectual

**€22.8m**

in development expenses of which 50 % have been capitalised

Provide an environment conducive to attracting and retaining talent



Human

**1%**

**6.1%**

growth in the workforce of permanent contract departure rates

Design products that meet the expectations of target markets



Industrial

**€45.5m**

**€25.8m**

EBITDA

COI

Sell products that meet the expectations of target markets



Commercial

**€225.6m**

Revenues (+8.9%)

A solid distribution of sales, both geographically and in terms of activity



Financial

**€184m**

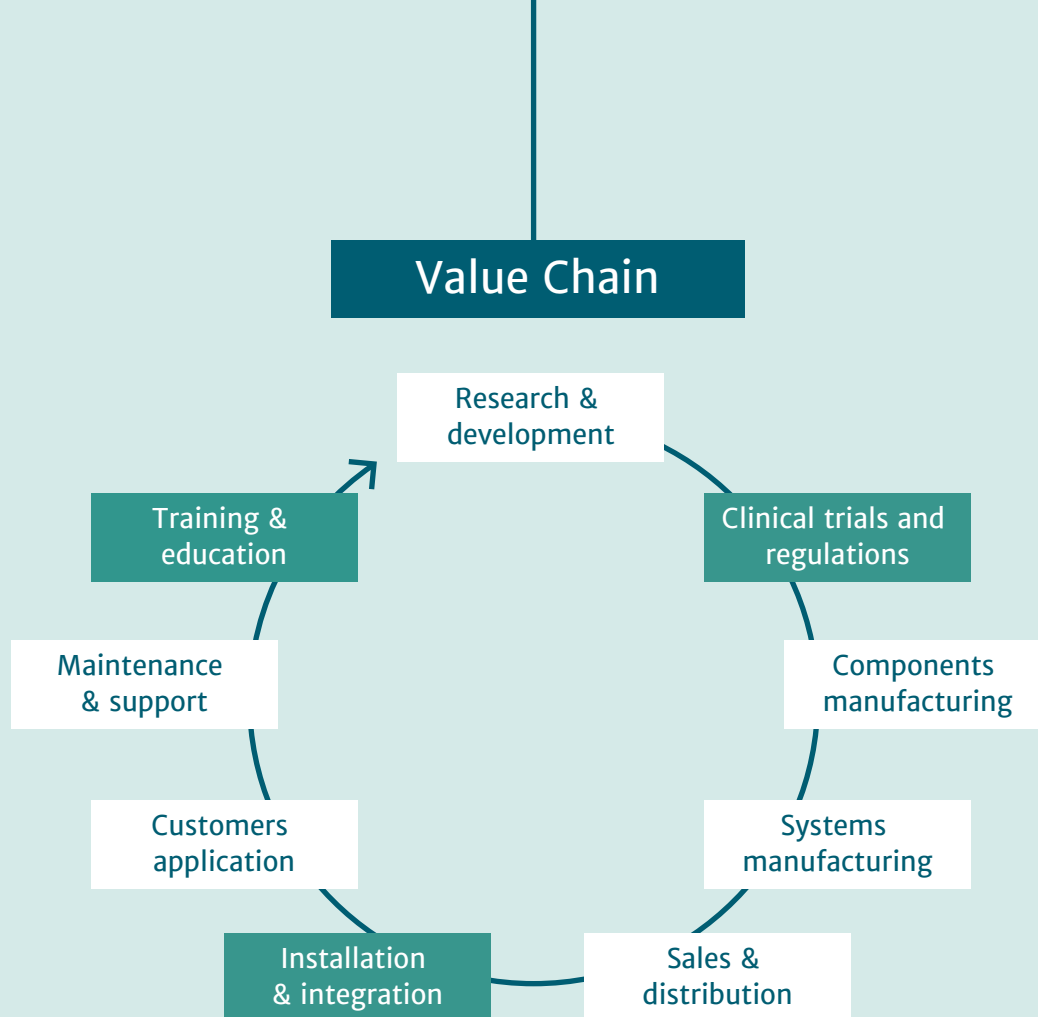
investments in 2025

## CSR



- Moderate energy consumption (10 491 MWh of which 72% d'electricity)
- Decrease in electricity consumption by 4.4% in 2025 compared to 2024
- 27% of electricity consumed from renewable resources





- The **upstream** value chain includes suppliers (raw materials, components)
- The **downstream** value chain includes customers for sales and services, research institutes, grant-awarding institutions, financial institutes providing financing and post-manufacturing waste management.

*Glossary: green boxes refer to activities undertaken by the Medical Division only*

<p><b>Research &amp; development</b></p> <p>Innovation and investment to:</p> <ul style="list-style-type: none"> <li>➤ Develop new laser technologies</li> <li>➤ Improve existing technologies</li> <li>➤ Explore new applications.</li> </ul>	<p><b>Training &amp; education</b></p> <p>Training programs teach users how to operate and maintain systems efficiently, to ensure optimum performance and safety.</p>	<p><b>Maintenance &amp; support</b></p> <p>Ensure ongoing system operation, including repairs and upgrades, as well as warranty support.</p>
<p><b>Customers application</b></p> <p>End-users use the technology for a variety of applications.</p>	<p><b>Installation &amp; integration</b></p> <p>Install and integrate systems into customer installations, ensuring that the new product works and is compatible with existing systems</p>	<p><b>Clinical trials &amp; regulations</b></p> <p>Obtain and maintain government approvals for medical devices and applications.</p> <p>Conduct clinical trials for which a specific indication is being evaluated for the first time.</p>
<p><b>Components manufacturing</b></p> <p>Suppliers produce key components such as laser diodes, optical fibers and mirrors.</p>	<p><b>Systems manufacturing</b></p> <p>Manufacturers assemble components in laser systems, ensuring quality control.</p>	<p><b>Sales &amp; distribution</b></p> <p>Distributors and sales channels distribute components/systems to endusers</p>



## 4 fundamental pillars of CSR strategy

### Social

Promoting diversity, equality and social inclusion	Manage employee careers
Attracting talents	Strengthening health and safety at work
Promoting well-being at work	Cultivating social dialogue
Developing skills	

### Environment

Reducing our water consumption	Adapting to climate change
Innovate and produce sustainably	Promoting actions in favor of the planet
Encouraging virtuous mobility	Acting in favor of biodiversity
Fighting pollution	Reducing our GHG emissions
Recycling our waste	

### Governance

Fighting modern slavery	Strengthening Group culture
Sharing our values and strategy	Managing financial and non-financial risks
Fight against child labor	Fight against tax evasion
Fight against corruption	

### Stakeholders

Promoting the circular economy	Buying responsibly
Satisfying customers	Respecting confidentiality
Supporting the local economy	

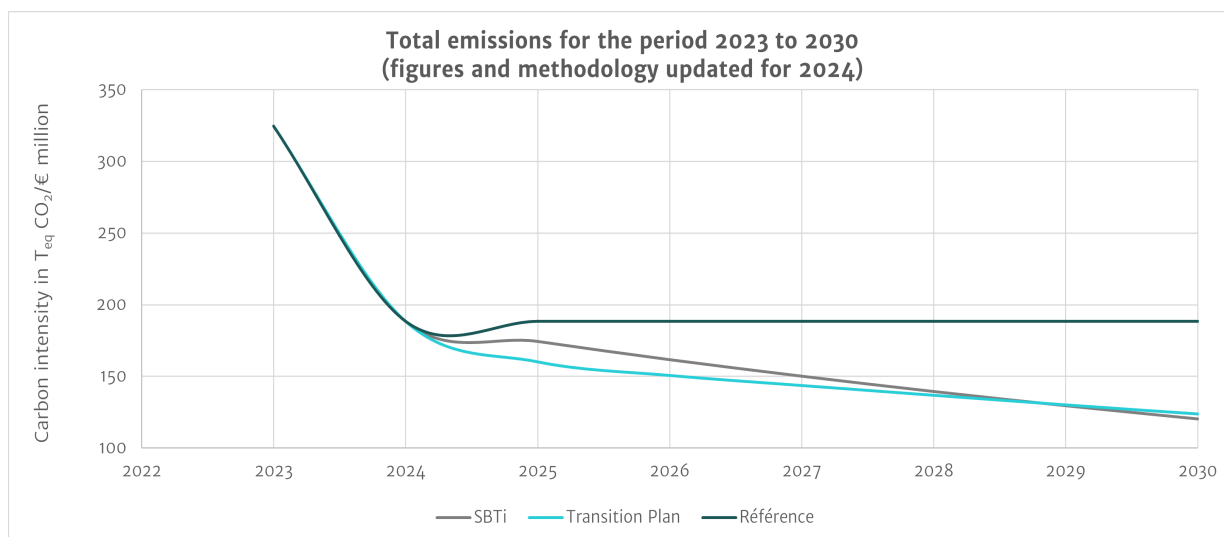


## Environmental strategy

The Lumibird Group has always attached great importance to the sustainability of its business model, striving to limit its impact on the environment.

Despite the reduced footprint resulting from its integration activities, as of 2022, it has chosen to initiate a plan to reduce its water and energy consumption. In 2023, after assessing all its greenhouse gas emissions for the first time in its history, it committed to reducing its carbon footprint as closely as possible to the objectives of the Paris Agreement through its climate transition plan in 2024. Now at the heart of the Group's environmental strategy, it aims to reduce its carbon intensity by 30% by 2030 in line with the SBTi trajectory, while maintaining a high level of growth.

### Carbon intensity over the period 2023 to 2030



To achieve this within the defined timeframes, the Group is using various levers to achieve :

- A **22%** reduction in electricity consumption;
- A **44%** drop in emissions from fixed assets;
- A **7%** reduction in gas consumption;
- A **5%** reduction in business travel.

At the same time, it also intends to limit the increase in its emissions resulting from purchased products and services to less than 4%, irrespective of expected growth.

# Social and governance strategy

## Social

### Our mission

- Develop a range of lasers to **treat, guide, communicate, protect, manufacture and study**, by industrializing the manufacture of high-performance devices

### Our priorities

- Improve the **attractiveness** of the company,
- Improve the **well-being, health and safety** of its employees at work,
- Strengthen **skills** development,
- Ensure **professional equality** between men and women, whatever their origin.

### Our social mission

- Developing **sustainable** and **inclusive** growth.

### Social approach

Lumibird is guided by the following United Nations Sustainable Development Goals:



## Governance

Corporate governance and ethical business conduct are essential elements of the Lumibird Group's sustainability strategy, and refer to the ethical principles and values that guide the Group's business practices. This includes aspects relating to ethical behavior, responsible business practices, respect for human rights and the promotion of ethical behavior throughout the supply chain.

La culture d'entreprise constitue ainsi un levier essentiel pour intégrer les principes de durabilité dans les activités de l'organisation.

Lumibird fosters a culture of ethics, responsible innovation and collaboration. Shared values such as commitment, efficiency, resilience, humility and agility guide strategic and operational decisions. The Group encourages its employees to adopt sustainable behaviors and contribute to initiatives that have a positive impact on communities and the ecosystem.



# Lumibird Group non-financial key figures

## Environment

### Scope 1-1 Gas

**586 t CO<sub>2</sub>e**

(530 t CO<sub>2</sub>e in 2024\*)

- The 2024 estimate contained a conversion error in some of the input data, which resulted in an underestimation (313 t CO<sub>2</sub>e initially calculated versus 530 t CO<sub>2</sub>e after correction).

### Scope 2-1 Electricity

**1,554 t CO<sub>2</sub>e**

(1,632 t CO<sub>2</sub>e in 2024)

- A reduction of approximately 3%, reflecting the energy-saving efforts made at the main production sites.
- Installation of a 100-kW photovoltaic system at the Adelaide site (225 solar panels)

### Scope 3 Other indirect emissions

**36,257 t CO<sub>2</sub>e**

(2024 data not updated in 2025)

- Despite the lack of data, efforts have continued, particularly in the areas of transportation policy and waste sorting.

## Social



**86**

### Professional equality index (France) <sup>(1)</sup>

- Group's Projected equality index <sup>(2)</sup>: **85** (81 in 2024)



**6.1 %**

Attrition rate

(7.7 % in 2024)

- Worldwide, an attrition rate of less than 10% is considered healthy<sup>(2)</sup>

## Governance

**50% (3 out of 6)**

Proportion of independent directors

(50%, 3 out of 6, in 2024)

- And an equivalent proportion (3/6) of women on the Board

<sup>(1)</sup> If "France" not specified, Group indicators

<sup>(2)</sup> Methodology: Index for companies with 50 to 250 employees.





## Chapter 1 General information

Our journey towards esg reporting began several years ago with the introduction of the European Directive 2014/95/EU on the reporting of non-financial performance and set out the Group's approach to the social, environmental and societal challenges arising from our business model. This report provides stakeholders with information on environmental, social and governance (ESG) performance, identifying the ESG issues that need to be considered and addressed.

### 1.1. STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Data relating to Lumibird's market position, strategy, business model and the Group's value chain are disclosed in the Guidelines and Vision chapter above.

### 1.2. INTERESTS AND VIEWPOINTS OF STAKEHOLDERS

The views and expectations of our stakeholders are important to us. We actively engage with our stakeholders

(through surveys and interviews) to obtain feedback on our performance in general and on sustainability issues. Through ongoing dialogue, we strive to understand their positions, concerns and expectations. This ongoing interaction informs our sustainability efforts, projects and processes, enabling us to align with the interests and views of our stakeholders. The insights we gain from these ongoing dialogues are used to inform our dual assessment of the materiality.

Key stakeholder groups	Our actions	How we create value	Key achievements in 2025
Employees	<ul style="list-style-type: none"> <li>→ Labour relations and representation on occupational health and safety</li> <li>→ Works Council members elected by employees</li> <li>→ Discussions on personal development</li> <li>→ Workplace surveys and assessments</li> </ul>	<ul style="list-style-type: none"> <li>→ Include employee perceptions and experiences</li> <li>→ Contribute to a sustainable workplace and professional life</li> <li>→ Promote inclusion and diversity</li> <li>→ Employee training and development plans</li> </ul>	<ul style="list-style-type: none"> <li>→ Improvement and simplification of processes</li> <li>→ Regular communications from Management</li> <li>→ Action plan following the global employee survey results</li> <li>→ Introduction of new employee benefits</li> </ul>
Shareholders, investors and equity analysts	<ul style="list-style-type: none"> <li>→ ESG ratings</li> <li>→ Conference calls, meeting presentations, emailing</li> <li>→ Regular information</li> <li>→ Participation in specialist forums</li> </ul>	<ul style="list-style-type: none"> <li>→ Understanding sustainability expectations</li> <li>→ Attracting responsible investors</li> <li>→ Improving transparency</li> </ul>	<ul style="list-style-type: none"> <li>→ Regular communication and events, including conference calls, site visits, individual and group meetings</li> <li>→ Assessment of the Group's ESG performance by CSR rating agencies</li> </ul>
Customers	<ul style="list-style-type: none"> <li>→ Customer support and service</li> <li>→ Training and education for ophthalmology customers</li> <li>→ Customer satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>→ Enabling customers to achieve their goals</li> <li>→ Providing sustainable solutions</li> <li>→ Building trust</li> </ul>	<ul style="list-style-type: none"> <li>→ Product and service improvements</li> <li>→ Training</li> </ul>
Supply chain and partners (suppliers, subcontractors)	<ul style="list-style-type: none"> <li>→ Supplier due diligence questionnaire to assess compliance, human rights and sustainability issues</li> </ul>	<ul style="list-style-type: none"> <li>→ Promoting responsible sourcing</li> <li>→ Protecting the human and labour rights of workers</li> <li>→ Ensuring the production of quality products</li> </ul>	<ul style="list-style-type: none"> <li>→ Annual questionnaire to provide feedback on Lumibird's performance, and</li> <li>→ Annual review of supplier evaluations (by the following departments: quality, customer service, purchasing and procurement, technical departments / R&amp;D)</li> </ul>
Innovation drivers (universities, research institutes, teaching hospitals)	<ul style="list-style-type: none"> <li>→ Joint initiatives and programmes</li> <li>→ Contributions to strategic orientations</li> <li>→ Workshops and knowledge sharing</li> </ul>	<ul style="list-style-type: none"> <li>→ Providing sustainable solutions</li> </ul>	<ul style="list-style-type: none"> <li>→ Through internal and collaborative R&amp;D projects such as: Focal, Ophellia and Halloa (EU) as well as technical seminars in which the Group participates.</li> </ul>





Key stakeholder groups	Our actions	How we create value	Key achievements in 2025
Civil society (local communities)	<ul style="list-style-type: none"> <li>Contribution to community projects for the benefit of the community</li> </ul>	<ul style="list-style-type: none"> <li>Building trust and community support</li> <li>Ensure that the community benefits from it</li> </ul>	<ul style="list-style-type: none"> <li>Food Bank (Australia)</li> <li>Hope for the holidays (United States)</li> <li>Sports - sailing, judo (France)</li> </ul>
Governments and regulatory bodies	<ul style="list-style-type: none"> <li>Direct dialogue with political decision-makers</li> <li>Joint initiatives and programmes</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring regulatory compliance</li> <li>Promoting sustainable construction</li> </ul>	<ul style="list-style-type: none"> <li>Technical development programmes</li> <li>Provision of services as part of government tenders for hospitals</li> </ul>

In terms of the transition to a low carbon economy, it is expected that regulation and customer and supplier behaviour will evolve in favour of low carbon products and packaging, although it is still clear that other non-climate factors will continue to have a strong influence on purchasing behaviour.

When it comes to Lumibird's employees, the Group's mission is to provide an inclusive environment where they

can thrive, innovate, collaborate, learn, perform and interact with leaders to contribute to the Group's development.

Finally, Lumibird is building an organisation in which its values are at the heart of how it operates, underpinning its governance framework.





## Chapter 2 Environmental information

### 2.1. CLIMATE CHANGE

#### 2.1.1. Contextual elements.

##### 2.1.1.1. Reminder:

The Lumibird Group's industrial operations are based on 10 production sites, the exact locations of which are detailed below:



Six other sites – dedicated to administrative, commercial, R&D and after-sales activities – located in Minneapolis, Montreal, Shanghai, Rennes, Cesson-Sévigné and Talence, complete the Group's global operational footprint required for its operations.

##### 2.1.1.2. Exposure to the physical risks of climate change:

Following an internal study carried out in 2025, the activities carried out at Lumibird Group sites do not appear to be vulnerable to the physical risks associated with climate change. This study aimed to assess the exposure of each site to climatic hazards potentially linked to temperature (heatwaves, cold spells, etc.), wind (storms, cyclones, etc.), water (heavy rainfall, flooding, etc.) and solid masses (erosion, landslides, etc.). This study also took into account, in part, upstream activities—including potential supply chain difficulties—and downstream activities—including after-sales service returns following such events. No factors indicating particular vulnerability were identified. In some cases, business continuity plans may take certain climate-related hazards into account, but this does not imply that the site is overexposed to the consequences of climate change. This study may be updated within the next five years.

##### 2.1.2. Climate change strategy.

The Lumibird Group has always been committed to the sustainability of its business model, in particular by seeking to limit its impact on climate change.

Despite the limited footprint resulting from its integration activities, the Group has decided to launch a plan to reduce its water and energy consumption as early as 2022. In 2023, after the first assessment of its greenhouse gas emissions (Scopes 1, 2 and 3), the Group committed in 2024 – through its decarbonisation plan – to reduce its carbon footprint in line with the Paris Agreement targets.

Now at the heart of its environmental strategy, this plan aims to reduce its carbon intensity by 30% by 2030

In 2025, these efforts resulted in a reduction in electricity consumption across the Group and the installation of a 100 kW photovoltaic system at the Adelaide site, comprising a total of 225 panels.

##### 2.1.3. Decarbonisation plan<sup>1</sup>

###### 2.1.3.1. Introduction:

In light of the risks and opportunities associated with climate change, the Lumibird Group intends to secure its business over the long term. Its first decarbonisation plan

1 The decarbonisation plan set out in this report is based on the data presented last year, as it has not been possible to collect all the necessary data to update this decarbonisation plan for the financial year ending 31 December 2025.





reflects this approach. It demonstrates the Group's commitment to developing a business model that combines economic efficiency with sustainability. It aims to progressively decarbonise its operations, aligning as closely as possible with the goals of the Paris Agreement.

The Lumibird Group's transition plan was approved by its governance bodies (Executive Committee and the CSR Committee of the Board of Directors)

**2.1.3.2. Greenhouse gas emissions reduction target:**

Lumibird's target is to reduce its GHG emissions by 2030 to a level almost equivalent to that of 2024.

Over the same period, this approach will enable the Group to increase its revenue by nearly 43% while reducing its carbon intensity by more than 30%.

The scope of application of this decarbonisation plan covers all of our activities, regardless of their nature or location.

**2.1.3.3. Decarbonisation levers:**

- 2023 Baseline: the reference value used in the Group's decarbonisation trajectory.
- Revenue growth over the 2024–2030 period: the revenue growth assumptions for the 2024–2030 period are presented below:

Year	2024	2025	2026	2027	2028	2029	2030	Change
Growth	1%	8%	8%	5%	5%	5%	5%	43%

**2.1.3.3.1. Decarbonisation actions**

Despite business growth, the Group aims to reduce its total absolute greenhouse gas emissions by 12%. To achieve this, the Group plans to reduce the impact of its

business model through a series of decarbonisation actions, as detailed in the table below:

Scopes - Categories	Overall GHG emissions variations from 2024 to 2030	Planned actions for the 2024–2030 period
1-1 Gas	-7%	The Group uses gas exclusively to heat its buildings during the winter months. The plan is to reduce the average temperature of infrastructures by -1°C by 2025.
2-1 Electricity	-22%	Electricity is used by the Group for manufacturing its products, as well as for air conditioning and heating its facilities, depending on the season. The decarbonisation levers are as follows: <ul style="list-style-type: none"> <li>➤ A 12% reduction in the Group's electricity consumption through the implementation of a control process for energy-intensive equipment and the introduction of monthly monitoring from 1 January 2025.</li> <li>➤ A 9% reduction in total consumption through the installation of 4,000 sq meters of photovoltaic panels at the Adelaide, Cournon and Lannion sites.</li> <li>➤ An increase in the supply of “green” electricity, resulting in a 31% reduction in our GHG emissions.</li> </ul>
3-1 Purchased products and services	+4%	The Group's inputs account for 75% of its GHG emissions. To limit their growth to under 5% while revenue grows by 43% over the same period, the Group plans to: <ul style="list-style-type: none"> <li>➤ Reduce them by 14% by continuing its vertical integration strategy.</li> <li>➤ Reduce them by 14% by prioritising suppliers closer to manufacturing units and in countries with a more favourable energy mix.</li> <li>➤ Reduce them by -2% by optimizing intragroup flows.</li> </ul>
3-2 Fixed assets	-44%	After several years of intensive investment (new buildings in Lannion and Ljubljana) to prepare for future growth, the Group will reduce its investments by 44% over the period 2024–2030, which will reduce the associated GHG emissions proportionately.
3-6 Business travel	-5%	In 2023, the Group's fleet consisted of approximately one hundred vehicles, primarily allocated for business purposes. To achieve this target, between 2024 and 2030, the Group will gradually replace these vehicles with cars emitting less than 50g of CO2 per kilometer travelled .





## 2.1.3.3.2. Projected trends in GHG emissions

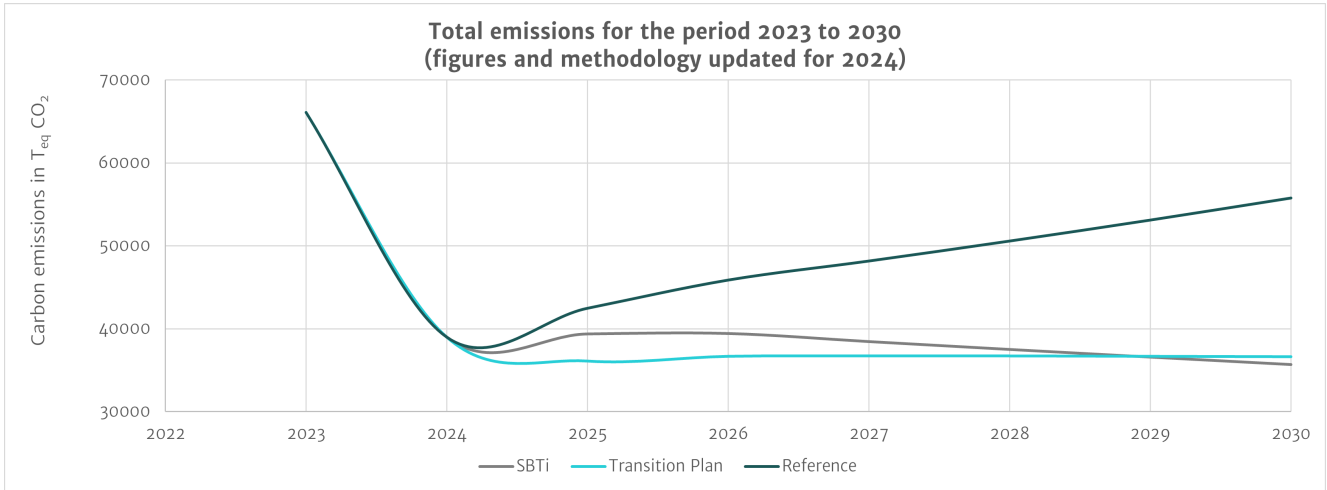
The decarbonisation schedule for our business model is as follows:

Scopes - Categories	2024	2025	2026	2027	2028	2029	2030
1-1 Gas	0.0%	-7.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2-1 Electricity	-1.5%	-17.2%	0.7%	-1.9%	-1.1%	-1.1%	-1.1%
3-1 Purchased products and services	0.7%	3.9%	3.0%	-0.4%	-0.8%	-1.2%	-1.2%
3-2 Fixed assets	-12.5%	-35.5%	0.0%	0.0%	0.0%	0.0%	0.0%
3-3 Emissions from fuels and energy (not included in scope 1 and 2)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3-4 Upstream goods transport and distribution	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3-5 Waste generated	0.7%	4.4%	4.4%	1.4%	1.4%	1.4%	1.4%
3-6 Business travel	-5.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3-7 Commuting	1.3%	-2.9%	2.1%	1.3%	1.3%	1.3%	1.3%
3-8 Upstream leased assets	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3-9 Downstream goods transport and distribution	0.7%	6.4%	6.0%	2.6%	2.2%	1.8%	1.8%
3-10 Transformation of products sold	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3-11 Use of products sold	0.1%	0.7%	0.7%	0.4%	0.4%	0.4%	0.4%
3-12 End-of-life of products sold	0.1%	0.7%	0.7%	0.4%	0.4%	0.4%	0.4%
3-13 Downstream leased assets	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3-14 Franchises	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3-15 Investments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Note: The percentages in this table represent the annual change compared to the previous year (n-1) and include the increase in emissions due to the growth of the group.

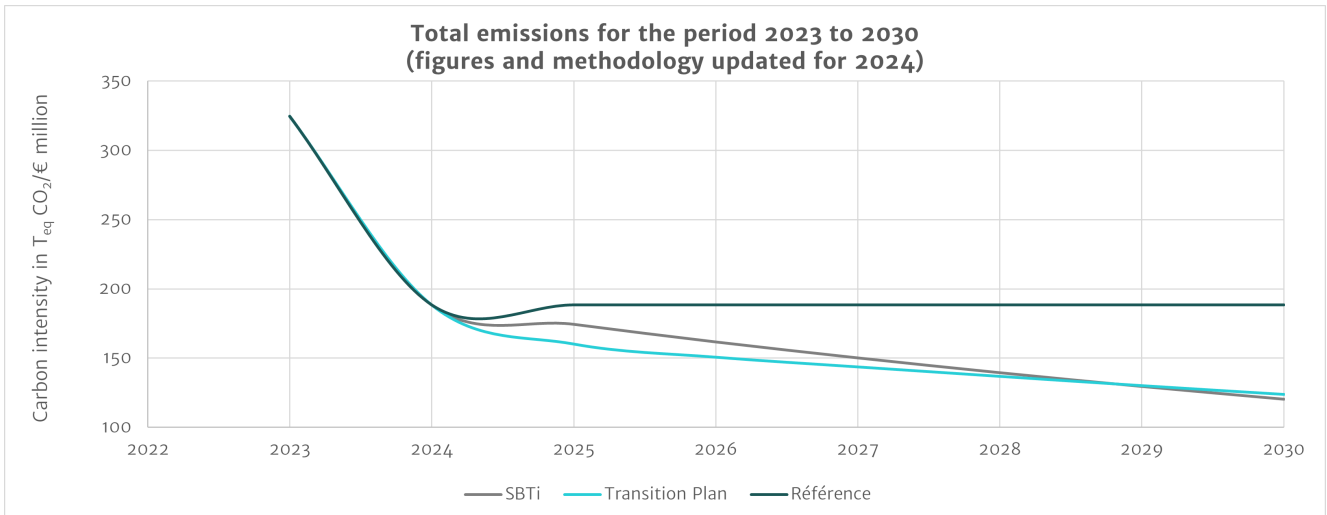
The Group's absolute GHG emissions are expected to decrease to 36,660 tCO<sub>2</sub>e by 2030, a level close to that of 2024, while sales are expected to increase by 43% between 2024 and 2030.

The expected annual variation in absolute terms is shown below:



It should be noted that the transition plan will fall slightly short of the SBTi targets, and it will be necessary to offset this shortfall (+2.8%) by adjusting the decarbonisation measures in order to meet the targets set. The drop in overall emissions between 2023 and 2024 is due to a change in methodology and does not represent a drastic reduction in the Group's emissions.

The expected annual variation in Lumibird's carbon intensity is shown below:



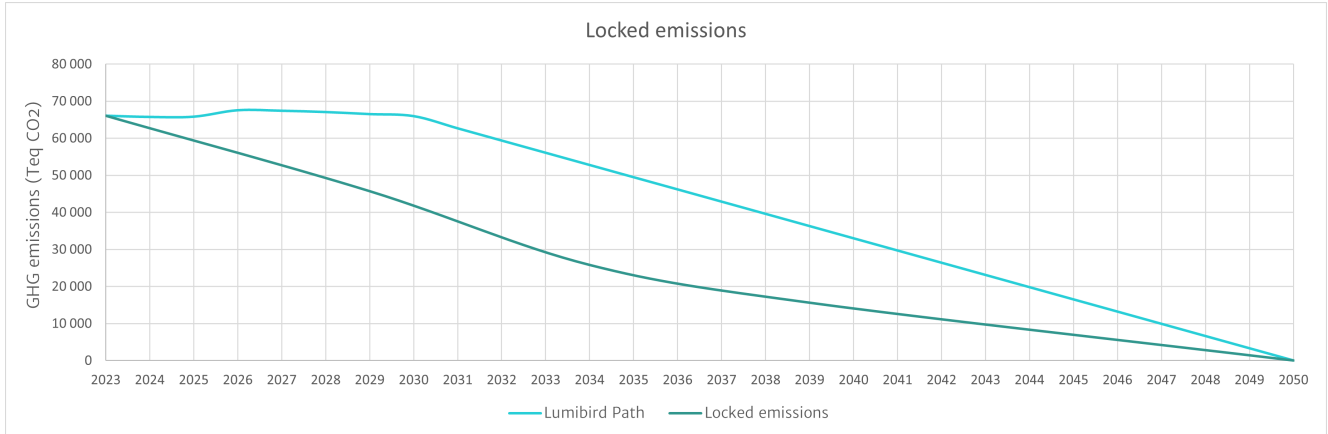


2.1.3.3.3. Locked-in emissions

Based on the GHG Protocol, locked-in emissions mainly involve the heating of buildings over the lifetime of boilers (Scope 1), purchased goods and services due to the location of essential suppliers (Scope 3-1), transport and distribution of manufactured products due to our commercial footprint (Scope 3-9), and energy consumption from the use of sold products over their entire lifecycle (Scope 3-11).

A first estimate shows that they amount to 45,500, 26,000 and 15,500 tCO<sub>2</sub>e over 5, 10 and 15 years respectively.

At this stage, the residual GHG emissions associated with locked-in emissions do not hinder our decarbonisation strategy along the chosen trajectory and therefore do not pose any transition risk.



However, a more in-depth analysis will be carried out within 36 months, to confirm the conclusions of the first assessment, particularly beyond 2030.

Note: The simplified extrapolation of Lumibird's emissions between 2030 and 2050 reflects the Group's ultimate objective of fully decarbonising its business model by 2050.

2.1.3.3.4. Carbon offsetting

Given the levers available to the Group, carbon offsetting is not currently being considered.

2.1.3.4. Management, monitoring and governance arrangements:

By the end of 2026, Lumibird aims to put in place a management and monitoring process for its transition plan. In particular, it will specify the detailed governance arrangements for this topic. In addition to the energy consumption indicator that is currently being rolled out to all of our sites, we will benefit from new indicators directly linked to the 3 levers identified for scope 3. This dedicated management dashboard will be updated monthly, reviewed quarterly by the Executive Committee, and presented at the same frequency to the CSR Committee of the Board of Directors.

Lastly, the disclosure of these non-financial figures will be subject to annual publication.

The results achieved under this framework are intended to impact the variable component of the Group's employee remuneration. Starting in 2027, 15% of the Lumibird employee profit sharing bonus will be subject to the Group's electricity consumption in 2026 being at or below the 2025 level.

2.1.3.5. Update procedures for the transition plan

The decarbonisation plan set out in this report is based on the data presented last year, as it has not been possible to collect all the necessary data to update this decarbonisation plan for the financial year ending 31 December 2025.

Lumibird's transition plan will be updated no later than 31 December 2026. It will be based on 2023-2025 GHG emissions and their deviation from the chosen trajectory. The decarbonisation measures may be reassessed.

2.1.3.6. Outlook beyond 2030

The analysis required for the Group to define a net-zero emissions target by 2050, in line with a "long-term" SBTi trajectory, is not yet complete. It will be carried out within the next three years.

2.1.3.7. Internal carbon pricing

As of today, Lumibird does not have an internal carbon price.





## 2.1.4. 2025 Greenhouse gas emissions

### 2.1.4.1. Energy consumption

In 2025, the Group's energy consumption (scope 1 and 2) was as follows:

Energy consumption	2025	2024	Change 2025 / 2024
<b>Scope 1</b>			
Natural gas (MWh)			
French site	1,135	913	+24 %
Other sites	1,722	1,693*	+1.7 %
<b>TOTAL Gas</b>	<b>2,857</b>	<b>2,606</b>	<b>+9.6 %</b>
<b>Scope 2</b>			
Electricity (MWh)			
French sites	2,998	3,039	-1.3 %
Other sites	4,636	4,948	-6.3 %
<b>TOTAL Electricity</b>	<b>7,634</b>	<b>7,987</b>	<b>-4.4 %</b>
<b>Scope 1 &amp; 2</b>			
<b>Total Energy (MWh)</b>	<b>10,491</b>	<b>10,593</b>	<b>-1 %</b>
<b>Total Energy (MWh/M€)</b>	<b>46.5</b>	<b>51.1</b>	<b>-9 %</b>

\* Revised gas consumption (originally published figure: 613).

In 2025, with a scope of operations virtually identical to that of 2024, the Group's overall energy consumption fell by around 1%. Relative to revenue, 2025 saw a 9% improvement compared with 2024. The main energy-intensive sites are Lannion and Turin. The Lannion site saw an increase in energy consumption, mainly due to new activities related to the fibre drawing tower.

The increase in gas consumption was particularly significant at the Lannion, Villejust and Minneapolis sites, reflecting increased activity. This consumption can be monitored in future to identify effective reduction measures that are suited to business growth. It is worth noting, however, the 16% reduction in gas consumption at the Bozeman site.

Over the same period, the Group's electricity consumption fell by 4.4%, reflecting the reduction efforts and policies implemented at each site. Ten sites saw their electricity consumption decrease, with reductions ranging from -2% for Ljubljana to -30% for Gothenburg. The only site to have seen a drastic increase in electricity consumption is the new West Springfield site, which now houses the operations of the former Chicopee site and those of the former Convergent.

The breakdown of the Group's electricity mix, calculated on the basis of information provided by the various energy suppliers, is presented below:

Origin	Percentage
Total electricity consumption:	100 %
of which fossil-based electricity:	31 %
of which nuclear electricity	42 %
of which renewable electricity	27 %

The installation of a 100 kW photovoltaic system (225 solar panels) at the Adelaide site demonstrates the Group's commitment to implementing sustainable measures to minimise the environmental impact of its operations. Following the first few months of operation, initial assessments show that this system generates nearly 28% of the site's energy requirements. Furthermore, our

Gothenburg site is powered entirely by hydroelectricity, and the Ljubljana site entirely by nuclear power. Wherever possible, the Group will seek to prioritise more sustainable sources of electricity in line with the opportunities offered by different suppliers in the various countries where it operates.





## 2.1.4.1.1. Absolute greenhouse gas emissions in 2025

Scope 1 2025	Emissions in t <sub>eq</sub> CO <sub>2</sub>	Emissions in t <sub>eq</sub> CO <sub>2</sub> 2024 (and change)
1-1 Gas	586	530 (+10.5 %)
1-2 Direct emissions from mobile combustion sources	not calculated for 2025	NA
1-4 Direct fugitive emissions	not calculated for 2025	NA
Scope 2 2025	Emissions in t <sub>eq</sub> CO <sub>2</sub>	Emissions in t <sub>eq</sub> CO <sub>2</sub> 2024 (and change)
2-1 Electricity	1,554	1,602 (-3 %)
Scope 3 2024 <sup>2</sup>	Emissions in t <sub>eq</sub> CO <sub>2</sub>	Share of scope 3 emissions
3-1 Purchased products and services	11,583	31.9 %
3-2 Fixed assets	3,968	10.9 %
3-3 Emissions from fuels and energy (not included in scope 1 and 2)	260	0.7 %
3-4 Upstream goods transport and distribution	167	0.5 %
3-5 Waste generated	377	1 %
3-6 Business travel	0	0 %
3-7 Commuting	2,272	6.3 %
3-8 Upstream leased assets	0	0 %
Other indirect upstream emissions	0	0 %
3-9 Downstream goods transport and distribution	430	1.2 %
3-10 Processing of products sold	0	0 %
3-11 Use of products sold	15,526	42.8 %
3-12 End-of-life of products sold	174	0.5 %
3-13 Downstream leased assets	0	0 %
3-14 Franchises	0	0 %
3-15 Investments	0	0 %
Other indirect downstream emissions	0	0 %
Scope 3 Subtotal	36,257	100 %

The increase in Scope 1 emissions is linked to higher gas consumption, reflecting increased activity across the Group's various industrial sites—a trend consistent with the Group's growth. This rise in Scope 1 emissions is also attributable to the consolidation of the Group's operational scope (for example, West Springfield having absorbed the former Convergent operations) and the implementation of the vertical integration strategy (the Lannion fibre tower). On this 2025 baseline, the Group will be able to identify the most energy-intensive sites and activities and define decarbonisation levers to achieve the reduction targets.

The reduction in Scope 2 emissions is particularly encouraging and demonstrates that the efforts undertaken have been successful despite increased activity. Beyond the reduction measures implemented at sites, certain industrial processes will still require significant electricity consumption. Once all reduction measures have been identified and implemented, the Group will be able to reduce its emissions by prioritising renewable sources of electricity.

Due to the inherent difficulties in the methodology for calculating Scope 3 emissions, the Lumibird Group is not publishing data for the year 2025.

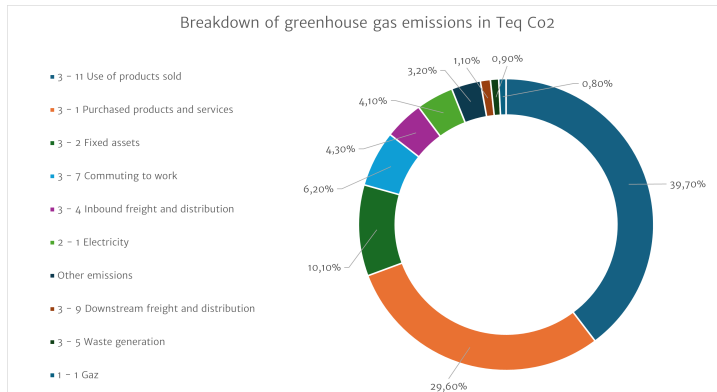
2 The Scope 3 figures presented in this report are the same as those presented last year, as it was not possible to collect all the data required to calculate Scope 3.





2.1.4.1.2. Absolute greenhouse gas emissions ("location based")<sup>3</sup>

In 2024, greenhouse gas emissions across all sectors were distributed as follows:



The use of products sold (39.8%), followed by products and services purchased (29.7%), are the two categories that generate the largest carbon footprint.

<sup>3</sup> The figures shown are the same as those presented last year.





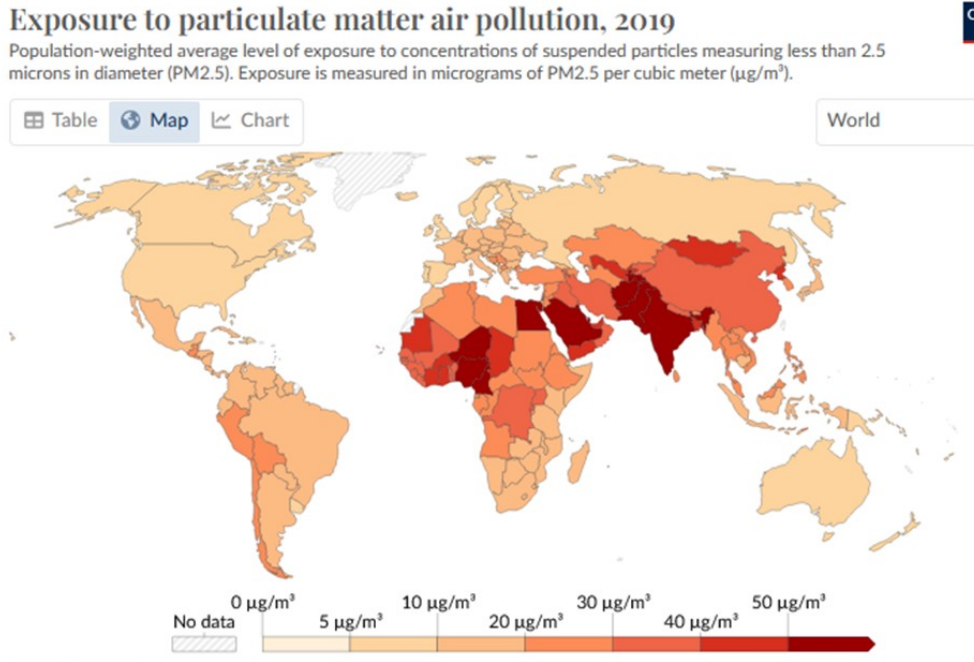
## 2.2. POLLUTION

### 2.2.1. Contextual elements.

In 2025, Lumibird directly consumed over 10,491 MWh (scope 1 and 2) to operate its factories, of which 73% was electricity. However, in view of its integration activity and based on previous risk assessments, it considers its direct contribution to pollution to be mainly atmospheric, resulting from the combustion of 21% of the gas used to heat the Bozeman, Lannion, Cournon, Villejust and Turin sites.

The boilers used are regularly inspected in accordance with local regulations to ensure that emission levels remain below legal limits.

In addition, all of the Group's industrial sites are located in areas with low to moderate levels of fine particulate matter, which further protects the health of employees working at these sites.



Source : ourworldindata.org/air-pollution

While microplastic pollution is recognised for its irreversible and highly probable nature, its overall impact remains limited given the size of the Group.

### 2.2.2. Global pollution management strategy

As part of its transition plan, Lumibird aims to reduce the amount of waste generated by its operations by 20% between 2025 and 2030. The expected effect will not only contribute to the reduction of the resulting GHG emissions, but will also proportionately help to reduce the pollution risks associated with this potential source. In the short term, however, progress in tackling pollution will be indirectly measured through the waste category in scope 3.

The two identified material topics are, on the one hand, the cleaning of anti-static gowns used in production to protect products from dust and electrostatic discharge, and on the other hand, the particulate emissions from the tires of employees' vehicles during their commute between home and work.

Although limited in scale due to their nature and the size of the Group, they contribute to the spread of microplastics and negatively impact the environment due to their irreversibility once fibres or particles are released into the natural environment.

#### 2.2.2.1. Protective gowns

The protective gowns used by the Group during the various stages of manufacturing its lasers, lidars, and medical equipment ensure their quality and long-term durability. Unfortunately, when they are cleaned, they can release plastic microparticles, which can end up in wastewater.

#### 2.2.2.2. Tyre wear

Tyre wear during the commute between home and work by Lumibird employees releases microplastic-laden particles, contributing to ambient air pollution.

In order to limit this impact, Lumibird has implemented a first mobility plan in France and is analysing various possible scenarios to extend it to other sites, adapting the solutions to the specific characteristics of each site.





## 2.3. WATER AND MARINE RESOURCES

### 2.3.1. Contextual elements

Our sites are located in areas where the risk of water stress is considered low to moderate and none of our sites uses direct water abstraction; all sites are supplied via conventional water supply networks.

In addition, we do not use water in our industrial processes, except in very small quantities in Lannion for the production of preforms. Effluents stored in a retention tank are managed under a contract with a specialised company for removal and treatment. Of the 9640<sup>m<sup>3</sup></sup> consumed in 2024, Lumibird estimates that over 99% is for domestic use.

Furthermore, in our manufacturing operations as such, we only use water in certain very specific industrial processes (such as fibre winding or preform production, for example). The effluent stored in retention tanks for this purpose is covered by a collection and treatment contract with specialist companies. Over 90% of water consumption is for sanitary purposes.

Finally, local wastewater treatment facilities ensure that discharges to aquatic and/or marine environments have little or no impact on the ecosystems affected.

### 2.3.2. Water and marine resource management strategy

Since December 2022, Lumibird has committed to reducing its water consumption, despite already having a very limited use of this resource. After an increase in the previous year, the Group achieved a water intensity of 46.5 m<sup>3</sup>/M€ in 2024. This figure represents a 3% reduction compared to 2023, reflecting the efforts of Lumibird and its employees to reduce water consumption on a daily basis.

Since December 2024, Lumibird has implemented a new reporting tool that allows it to track its water consumption on a monthly basis and quickly address any occasional deviations.

Given the relatively low importance of issues related to water and marine resources, Lumibird does not currently have a dedicated policy in this area.





## 2.4. BIODIVERSITY AND ECOSYSTEMS

Given our integration activities and the fact that we do not discharge any waste into the environment, the Lumibird Group considers that it has no direct impact on biodiversity and ecosystems.

### 2.4.1. Production site locations

The location of Lumibird's production sites that could potentially have a significant impact on biodiversity and ecosystems is detailed below:

Site	Surface area (m <sup>2</sup> )	Country	Main activity	Materiality (*)	Protected area nearby
Adelaïde	7,285	Australia	Medical lasers	Not confirmed	No
Bozeman	2,579	United States	Solid-state lasers	Not confirmed	No
Cournon	6,243	France	Medical lasers	Not confirmed	No
Göteborg	1,923	Sweden	Rangefinders	Not confirmed	No
Lannion	10,141	France	Fiber lasers	Not confirmed	No
Le Barp	1,238	France	Solid-state lasers	Not confirmed	No
Villejust	3,945	France	Solid-state lasers	Not confirmed	No
Ljubljana	4,473	Slovenia	Medical lasers	Not confirmed	No
Turin	1,100	Italy	Diode laser	Not confirmed	No
West Springfield	18,859	United States	Fiber lasers	Not confirmed	No

(\*) : Materiality of biodiversity-related issues (all topics combined)

### 2.4.2. Biodiversity and ecosystems management strategy

Between 2025 and 2030, Lumibird does not intend to implement any biodiversity or ecosystem preservation measures beyond those required by law, given the lack of impact.

### 2.4.3. Ecological compensation

Currently, Lumibird does not engage in any form of compensation for damage to biodiversity or ecosystems.





## 2.5. RESOURCE USE AND CIRCULAR ECONOMY

### 2.5.1. Contextual elements

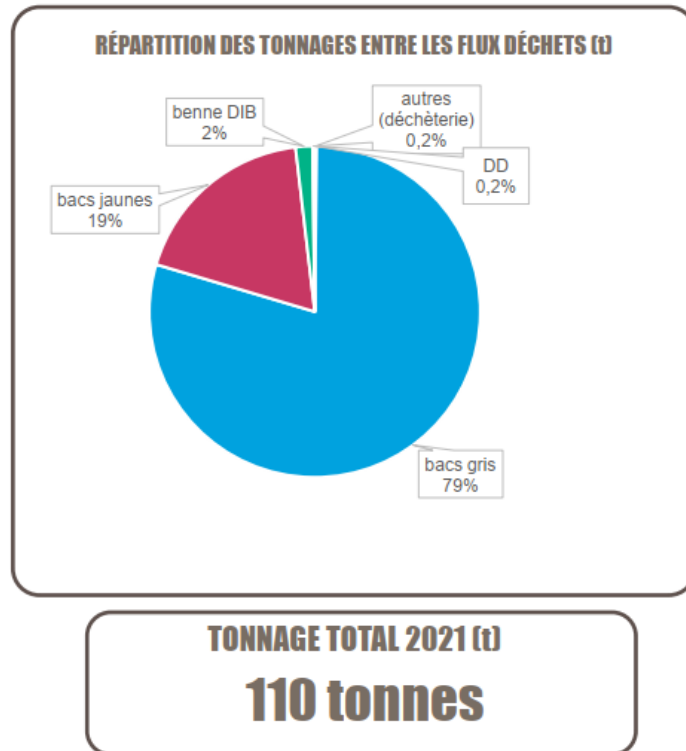
In terms of circular economy practices, we comply with the mandatory collection of chemical and electronic waste (processed by specialised companies) and recycle cardboard, light bulbs, used batteries and accumulators.

By generalising the quantities measured at the Lannion site, Lumibird estimates the waste production of its 10 manufacturing plants to be approximately 600 tonnes per

year, equivalent to 0.54 tonnes per full-time employee (FTE) annually. This value is 9 times lower than the average quantity per FTE produced in France in 2019 (Source: INSEE).

Furthermore, the non-hazardous waste generated by the Group's activities accounts for more than 99.5% of the total produced.

Finally, the amount of obsolete equipment retrieved from customers remains extremely limited. The lasers collected are, in some cases, donated to associations or NGOs.



Source : BPI « DIAG ECO FLUX » report of 28-4-2023 / Lannion





## 2.5.2. Circular economy management strategy

### 2.5.2.1. Global circular economy strategy

Lumibird's circular economy strategy is primarily aimed at extending the actions already initiated in the Medical Division on packaging to the entire Group, based on the principles of eco-design. In collaboration with our suppliers and customers, we aim to improve both the nature and quantity of materials used in the packaging of components and products, in order to limit their environmental impact.

### 2.5.2.2. Product lifespan

The lifespan of products manufactured by Lumibird depends on their performance level, the operating environment, and compliance with usage and maintenance requirements.

In practice, it can vary from a single use to several decades.

### 2.5.2.3. Product reparability

Overall, Lumibird is committed to repairing faulty products, subject to the availability of defective components from its suppliers. In some demanding markets, parts availability can exceed 25 years.

### 2.5.2.4. Waste management actions

Over the period 2025–2030, Lumibird aims to reduce its general waste by 20%, using new specific indicators to measure the effectiveness of the actions taken:

- Improve paper waste sorting;
- standardise the different bins and containers used for waste collection;
- improve the signage for waste sorting;
- expand sorting to include certain non-recyclable waste: plastic strapping, glassine paper (crystal)...

### 2.5.2.5. Use of recycled components in manufactured products

Given the technical nature of the products we manufacture, the use of recycled materials or components should remain very limited to avoid affecting their performance and lifespan.

### 2.5.2.6. End-of-life product management

End-of-life products are handled in accordance with the legal requirements of the countries in which Lumibird operates.





## Chapter 3 Social information

Our mission: to develop a range of lasers to heal, guide, communicate, protect, manufacture, and study, by industrialising the production of high-performance devices.

Our social mission: to develop sustainable and inclusive growth.

Our priorities:

- Improve the company's appeal;
- Improve employee well-being, health, and safety at work;
- Strengthen skills development;
- Ensure professional equality between men and women, regardless of their background.

Social approach:

Lumibird is guided by the following United Nations Sustainable Development Goals:



### 3.1. LUMIBIRD GROUP HUMAN RESOURCES POLICY

All employees, subcontractors, suppliers and business partners are covered by this policy.

**Lumibird Group's vision:** to provide the best laser solutions to heal, guide, communicate, protect, manufacture, and explore in a greener world.

**The Lumibird Group's mission:** to develop a range of lasers to heal, guide, communicate, protect, manufacture, and study, by industrialising the production of high-performance devices.

**The mission of the Human Resources Department:** to provide employees with an inclusive work environment where they can thrive, innovate, collaborate, learn, perform and engage with leadership to contribute to the Group's development.

**Human Resources policy:**

To carry out this mission, Lumibird is rolling out an adapted HR policy aligned with the following United Nations Sustainable Development Goals:

- **SDG 3:** Ensure healthy lives and promote well-being for all at all ages;
- **SDG 4:** Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all;
- **SDG 5:** Achieve gender equality and empower all women and girls;
- **SDG 8:** Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;
- **SDG 10:** Reduce inequality within and among countries.

In parallel, the Lumibird Group is committed to respecting the ILO Declaration on Fundamental Principles and Rights at Work, reflected in the following:

- Freedom of association and the effective recognition of the right to collective bargaining;
- The elimination of all forms of forced labour;
- The abolition of child labour;
- The elimination of discrimination in respect of employment and occupation;
- The creation of a safe and healthy working environment.

In order to support the commitment and expertise of its employees, which are among the Group's main strengths, Lumibird continually strives to keep them motivated and develop their skills.

To strengthen its appeal in an environment marked by a "war for talent," Lumibird aims to improve:

- Its attractiveness through social, human and motivating management, such as recruitment on permanent contracts, onboarding programmes, an incentive compensation policy and geographical mobility within the organisation;
- Employee well-being, health, and safety at work, through:
  - . Workplaces that are suited to the activities carried out;
  - . The development of new ways of working across a multi-site, multi-country environment: remote work, modern communication tools (video conferencing, group messaging, shared HRIS, etc.);
  - . The development of flexible working hours across our various sites and open dialogue around work-life balance;
  - . Medical monitoring adapted to the activities carried out (specific and regular eye tests for employees working directly on laser products).
  - . The development of a safety culture within the Group.
- The development of skills, through:
  - . A recruitment strategy that is open to diverse skills, talents and career paths, and promotes internal mobility;
  - . Support for internal and external training requirements throughout careers;
  - . The mapping of professions, which defines a reference framework of skills, consistent across the entire Group, to facilitate mobility between functions and the harmonisation of employee benefits;
  - . An annual assessment of employee performance through a discussion with their manager, based on skills and alignment with the company's values;
  - . The creation of an annual review of the workforce to build succession plans by identifying high-performing or high-potential employees and defining development action plans.





- Its social cohesion, through:
  - . The matrix-based hierarchical organisation put in place, combining scopes for responsibilities and geographical scopes, enabling the teams from various sites to work together in their area of expertise and developing a sense of belonging to the Group;
  - . The coordination of effective social dialogue, based on respect and open discussions, following a single Economic and Social Unit (UES) approach across France;
  - . The launch of an employee satisfaction and engagement survey to encourage the Group's managers and leaders to continuously improve employee well-being in order to support performance;
  - . The organisation of inclusive and friendly events across its sites;
  - . Strengthening internal communication.
- Its visibility, thanks to its participation in various trade fairs, its communication on social networks, and the hosting of trainees or work-study students at various levels to raise awareness of the Group and its professions.

The Group strives to:

- given its business model, maintain a preponderant part of the staff in R&D and in manufacturing;
- strengthen the Group's policy on access for people with disabilities.

The Group believes that workplace equality must enable men and women, regardless of their origin, to benefit from equal treatment in terms of access to employment, access to professional training and remuneration.

This is based on 3 principles:

- Equal rights for candidates applying for a job within the Group, regardless of their gender or origin, with a recruitment process based solely on the assessment of skills;
- Equal rights for women and men, with non discrimination between employees due to their gender, either directly or indirectly;
- Equal opportunities, aiming to address, through concrete measures, any inequalities that men or women may face in their professional life.

Finally, the Group ensures legal compliance with local regulations in all countries where it operates, with a focus on training teams to fight corruption and uphold Lumibird's Code of Business Conduct.

## 3.2. HUMAN RIGHTS AND LABOUR RIGHTS

### Our approach and policies

We respect the key international standards on human rights and labour rights as set out in the International Bill of Human Rights and the International Labour Organization (ILO) Guiding Principles. Our Human Resources policy fully reflects our commitment to ensuring freedom of association, the right to collective bargaining, the elimination of forced or compulsory labour, the effective abolition of child labour, and the creation of safe

and healthy workplaces (see: indicators on employees covered by a collective agreement).

Our priority is to ensure that adequate management systems are in place to identify, prevent, mitigate, and remedy any potential negative impact on human rights, whether related to our own workforce, value chain workers, or affected communities.

In cases where we identify potential negative impacts on human rights, we are committed to promptly and effectively implementing corrective measures.

In addition, we are committed to offering our employees safe and fulfilling working conditions through social protection measures. These include support in circumstances such as illness, unemployment, workplace accidents, or life events.

In addition, we offer other types of paid or unpaid leave related to family matters, in line with national regulations and collective agreements, such as marriage leave, family-related leave, leave to care for a sick child, paternity leave, etc.

Aligned with local practices, our basic unemployment and disability insurance ensures fair compensation and benefits. Similarly, we ensure that all our employees are paid at least the minimum wage of the country in which we operate.

Retirement benefits are included in our overall compensation package, and all employees are enrolled in a defined benefit pension scheme, with complimentary defined contribution options, or a pension fund for the duration of their employment with Lumibird, unless local legislation requires otherwise.

### Actions

- We actively ensure compliance with internationally recognised human rights standards by continuously gathering information and working with our business partners to identify and address potential violations.
- We also undertake periodic evaluations of the human rights implications of our own operations and those of our supply chain.

### Long-term objectives

- Offer a common minimum package of social benefits at the international level ("minimum platform benefits") to all our employees by 2027.

## 3.3. HEALTH AND SAFETY

### Our approach and policies

At Lumibird, we give priority to the physical, social and psychological safety of everyone working in the company, and protect it in the workplace. We believe that personal health and well-being are fundamental to a balanced life where everyone can reach their full potential.

As highlighted in our double materiality assessment, the risk of harm to health is significant due to the industrial nature of our operations, a risk that we actively mitigate through targeted actions.

For this reason, having a robust health and safety management system and fostering a culture that promotes employee health and safety is essential to our business.





This policy applies to all our employees and all our sites.

We also provide support systems for employees, including health insurance, access to psychologists and other health professionals, crisis counsellors and help with topics such as stress, relationships and family issues.

**Actions**

- Improving our health and safety record while continuing to grow the business. This includes ongoing prevention and mitigation efforts such as internal audits, emergency drills, safety training, risk assessments (DUERP in France), appointment of laser safety officers, stakeholder engagement through the CCST in France, and employee safety committees in Australia.
- Integrating safety into the design and use of our facilities: OSHA (Occupational Safety and Health Administration) standards in the United States and WHS (Work Health and Safety) regulations in Australia.

- Promoting a workplace environment where everyone feels empowered to share their thoughts, express innovative ideas, and speak freely. We launched a series of dynamic workshops exploring Lumibird's new core values, with the ultimate goal of fostering an open, creative, and inclusive culture.
- We continue to explore ways to support employees in leading fulfilling lives, both in and outside the workplace. This includes encouraging greater flexibility in working conditions, reassessing expectations around employee benefits, and improving the quality of the work environment. (In 2024, according to our internal social climate survey, 66% of Group employees felt they have a good work-life balance).
- We introduced a fitness and health programme for employees at our French sites, aimed at improving physical well-being and proactively addressing issues such as musculoskeletal disorders.

The total number of accidents that occurred within the Group in 2025 is detailed in the table below:

	Safety	2025	2024	Change
Our workforce	<b>Number of occupational accidents</b>	18	26	-31 %
	Number of accidents resulting in more than one day of absence	10	12	-17 %
	Number of accidents resulting in less than one day of absence	8	14	-43 %
	<b>Number of fatalities</b>	0	0	-
	Number of occupational illnesses	1	1	-

**Long-term objective**

- 0 occupational accidents in 2030

**3.4. DIVERSITY, EQUALITY & INCLUSION**

As highlighted in our double materiality assessment, the risk of differential treatment may exist based on gender, level of disability, age, and other factors.

At Lumibird, we recognise that diversity is a performance factor for the company. However, we need to improve this diversification, which was recognised by only 60% of employees in 2024, according to our internal survey.

To support this, we have established a global diversity and inclusion policy covering all Group employees, including executive and management roles, with responsibility assigned to our Human Resources department.

This policy is structured around 3 key pillars:

- Equal rights for candidates applying for a job within the Group, regardless of their gender or origin, with a recruitment process based solely on the assessment of skills;
- Equal rights for women and men, with non discrimination between employees due to their gender, either directly or indirectly;
- Equal opportunities, aiming to address, through concrete measures, any inequalities that men or women may face in their professional life.

We aim to create an inclusive environment at all levels of management to attract and retain talented individuals from all backgrounds and cultures. We are committed to

providing equal opportunities regardless of ethnic origin, religion, age, gender, disability status, sexual orientation, or marital status...

We are committed to diversity in senior management, and strive to increase the proportion of women in executive and management positions.

We also aim to improve the inclusion of employees with disabilities. In 2025, the Group employed 2.9% of people with disabilities (including 4.1% in France), compared to 2.6% in 2024. The Group will continue its efforts in 2026 to move closer to its long-term goal.

**Actions**

In 2025, we signed a professional equality agreement with our social partners in France.

- We will continue working to increase the representation of women in executive and management positions through targeted development programmes for talented women.
- We have implemented a new management training programme at Lumibird in France, the United States, and Australia, which includes non-discrimination.
- We are committed to ensuring equal pay between genders (professional equality index of 86/100 in France and a projected 85/100 globally, based on the rules applicable in France to companies with 50 to 250 employees).

For more information, please refer to the "Pay Gap" table in §10 below.





We share the fruits of our performance with all our employees. As such, in 2024 we negotiated a profit-sharing agreement with employee representatives, applicable to all Group employees for 3 years.

**Long-term objectives**

- 100% on the global professional equality index by 2030.
- 35% of women in the Group by 2030.
- Balance in the representation of women at the highest levels of management and in their overall share within the Group.
- 4% of employees with disabilities by 2030.

**3.5. TRAINING AND SKILLS DEVELOPMENT**

**Our approach and policies**

At Lumibird, we are committed to cultivating and developing a skilled workforce. We firmly believe that for employees to thrive, work effectively, and grow, it is essential that they are aware of the future opportunities that may arise.

We believe that learning is most effective through experience and meaningful interaction with others.

As mentioned in the double materiality assessment, the Group faces a clear risk of losing key talent or lacking opportunities for professional development. To address this risk, we are working to identify career pathways that enable employees to take ownership of their professional development, with the support of their managers.

Our aim is to support skills development and ensure equitable access to career progression, with individualised development programmes for employees with potential.

**Actions**

- we publish all job opportunities internally to give everyone the chance to apply.
- We are working to identify career paths that allow employees to take ownership of their progression, with the support of their managers.

**Long-term objectives**

- Employee satisfaction survey: 50% favourable responses by 2030 to the question: How would you rate your company in the following area: Opportunities provided to achieve your career goals?

**3.6. ENGAGING WITH OUR EMPLOYEES**

With this in mind, we are committed to creating a culture where all employees feel psychologically safe enough to speak up about important matters. This includes encouraging people to speak openly, regardless of their position in the organisation.

To this end, we conducted in 2024 our first global employee satisfaction and engagement survey, focusing on their perception of Lumibird as a company and workplace, their relationships with managers, and other factors influencing their working life. The results of the survey, which is part of a regular cycle, provide a valuable basis for

dialogue and help identify actions to improve our workplace.

In addition, we have created an easily accessible space on the <<Human Resources >> information system that allows employees to express their opinions, or report potential breaches of ethics.

**Actions**

- Continue implementing an action plan in 2026 to improve employee satisfaction, with results measured during the year.

**Long-term objectives**

- Social climate survey: 90% of employees proud to work for Lumibird in 2030.

**3.7. COMPLAINTS AND GRIEVANCES**

As mentioned in our double materiality assessment, when collective and individual protections and grievance resolution mechanisms are not provided or do not function effectively in the workplace, this can affect employee well-being.

We have put in place channels where employees can express their concerns. Access to remedy helps ensure fairness, justice, and the protection of individuals and communities.

It enables individuals to seek remedy and find a solution when they believe their rights have been violated, which promotes a fairer and more equitable workplace. If an employee feels they have been the victim of bullying, discrimination or harassment, they are encouraged to seek help. Employees can also file an official report with their local HR contact, speak to their employee representatives, or use the telephone line or Lumibird's global whistleblowing platform. For more information on our whistleblowing line and how we protect whistleblowers from retaliation, see section G1 on business conduct.

We take proactive measures to ensure that our employees are informed about the available grievance mechanisms and are regularly reminded of them.

This awareness is integrated into various aspects of the employee experience, including through Code of Conduct training.

- Internal awareness campaigns:

We frequently communicate with our employees through various internal channels – including emails, newsletters, our intranet and our HRIS platform – to remind them of the available grievance mechanisms and encourage their use.

We are committed to ensuring that our employees not only have access to these channels, but also the knowledge, confidence and psychological safety to use them when needed. As an organisation, Lumibird has a responsibility to take all reported cases seriously.

We also keep secure and confidential records of reports and their outcomes.

Number of complaints reported in 2025: **0 cases**





### 3.8. RISK OF PERSONAL DATA BREACH

As mentioned in our double materiality assessment, a personal data breach involving employees could have a negative impact on them.

To mitigate this risk, the Lumibird Group has implemented restricted access, through its HR Information System, depending on the country, and limited to those with Human Resources responsibilities.

In parallel, the Group applies data protection missions in line with GDPR requirements.

#### Workforce

Workforce as at 31/12	2025	2024	Change
<b>TOTAL GROUP WORKFORCE</b>	<b>1,078</b>	<b>1,068</b>	<b>0.9 %</b>
Number of permanent contracts	1,037	1,027	1.0 %
% / Group workforce	96 %	96 %	0 %
<b>Attrition rate (permanent contracts)</b>	<b>6.1 %</b>	<b>7.7 %</b>	<b>-1.6 pt</b>
Number of fixed-term contracts	41	41	0 pt
% / Group workforce	3.8 %	3.8 %	0 pt

The Group's total workforce is tracked through our global HRIS, which records all employees on permanent and fixed-term contracts.

In 2025, the Group's workforce increased by over 1%, with notable changes in Australia, the United States and Poland

#### Breakdown of workforce (registered) by country

Country	2025	2024	Change
France	553	559	-6
Australia	149	143	6
United States	142	137	5
Slovenia	70	70	0
Sweden	60	62	-2
Japan	34	33	1
Italy	30	29	1
Poland	19	16	3
China	11	10	1
Germany	4	3	1
Canada	3	3	0
Finland	1	1	0
Norway	1	1	0
United Kingdom	1	1	0
<b>Grand total</b>	<b>1,078</b>	<b>1,068</b>	<b>10</b>

### 3.9. HR INDICATORS AND DATA

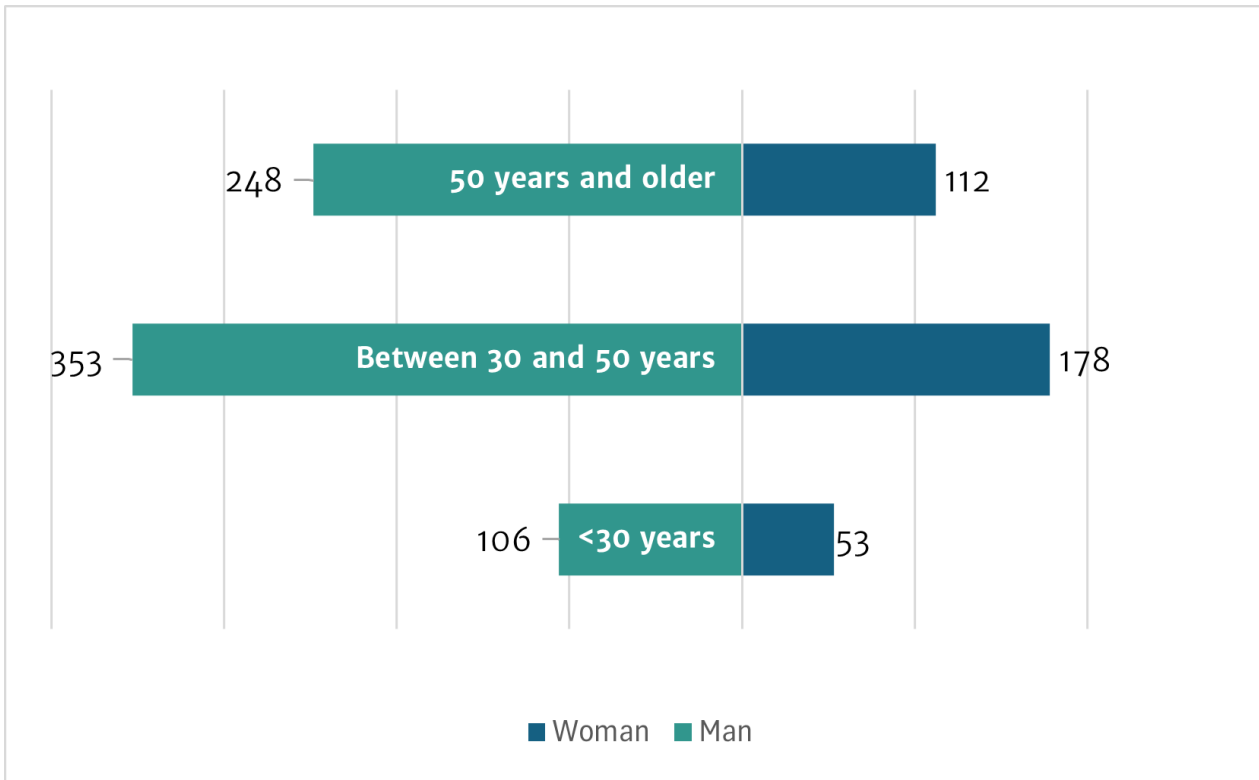
To monitor the effectiveness of its human resources strategy, Lumibird has defined a set of key indicators, including the percentage of employees on permanent contracts, the attrition rate (voluntary departures of employees on permanent contracts), the gender equality index in France and globally, and the pay equity ratio (total remuneration received by the Group CEO compared to the statutory minimum wage (SMIC)).

to support growth. The overall attrition rate for employees on permanent contracts fell significantly in 2025, by 1.6 pt compared to 2024, reflecting the Group's efforts to retain talent and its commitment to secure employment for its employees.





### Age pyramid



### Diversity by gender and country

Country	Women		Men		Total	
	Nb	%	Nb	%	Nb	%
Germany		0.00 %	3	100.00 %	3	100 %
Australia	46	29.40 %	103	69.13 %	149	100 %
Canada		0.00 %	4	100.00 %	4	100 %
China	2	18.18 %	9	81.82 %	11	100 %
United States	36	25.35 %	106	74.65 %	142	100 %
Finland		0.00 %	1	100.00 %	1	100 %
France	203	36.64 %	350	63.36 %	553	100 %
Italy	11	36.67 %	19	63.33 %	30	100 %
Japan	5	14.71 %	29	85.29 %	34	100 %
Norway		0.00 %	1	100.00 %	1	100 %
Poland	6	31.58 %	13	68.42 %	19	100 %
United Kingdom		0.00 %	1	100.00 %	1	100 %
Slovenia	28	40.00 %	42	60.00 %	70	100 %
Sweden	18	30.00 %	42	70.00 %	60	100 %
<b>GRAND TOTAL</b>	<b>355</b>	<b>32.90 %</b>	<b>723</b>	<b>67.10 %</b>	<b>1,078</b>	<b>100 %</b>





Total workforce (registered) by nationality / gender / average age

Nationality	Women		Men		Total	
	Number	Average age	Number	Average age	Number	Average age
South Africa			1	NC*	1	NC*
Algeria			2	34.6	2	34.6
Germany			2	48.1	2	48.1
Australia	31	45.5	84	48.2	115	47.4
Benin	1	NC*			1	NC*
Brazil			1	NC*	1	NC*
Cambodia	1	NC*	1	NC*	2	40.5
Canada			4	50.9	4	50.9
China	6	41.4	14	40.6	20	40.9
South Korea	1	NC*			1	43.5
Egypt	2	34.2			2	34.2
Spain	1	NC*	2	51.7	3	56.1
United States	37	43.5	105	44	142	43.9
Finland			1	NC*	1	NC*
France	193	43.1	337	42.3	530	42.6
Greece	1	NC*			1	NC*
Hong Kong	1	NC*	1	NC*	2	36.6
India	5	40.1	2	35.7	7	38.8
Iran	1	NC*	1	NC*	2	36.3
Italy	12	40.5	19	44.5	31	43
Japan	5	47.1	29	51.3	34	50.7
Kazakhstan			1	NC*	1	NC*
Malaysia			1	NC*	1	NC*
Morocco	2	28.5	2	49.2	4	38.8
Norway			1	NC*	1	NC*
New Zealand			1	NC*	1	NC*
Netherlands			1	NC*	1	NC*
Peru			1	NC*	1	NC*
Philippines	1	NC*			1	NC*
Poland	5	43.4	13	34.6	18	37.1
Democratic Republic of Congo			1	NC*	1	NC*
United Kingdom			1	NC*	1	NC*
Russia			1	NC*	1	NC*
Slovenia	28	44.3	42	46.8	70	45,8
Sri Lanka			1	NC*	1	NC*
Sweden	18	48.8	42	44.4	60	45,7
Tunisia	1	NC*	4	37.7	5	36,6
Turkey			1	NC*	1	NC*
Ukraine	1	NC*	1	NC*	2	35,1
Vietnam	1	NC*	3	49.5	4	43,5
<b>GRAND TOTAL</b>	<b>355</b>	<b>39.3</b>	<b>723</b>	<b>46.7</b>	<b>1078</b>	<b>43,8</b>

ND\*: Information not disclosed to prevent personal data breaches





### Base pay gap

	Number of women	Proportion of women	Number of men	Proportion of men	Average base pay gap by gender*
Executive Committee <sup>(1)</sup>	1	20 %	4	80 %	NC
Senior managers <sup>(2)</sup>	16	29 %	38	71 %	92 %
People managers <sup>(3)</sup>	40	26 %	111	74 %	90 %
Professional & staff <sup>(4)</sup>	298	34 %	570	66 %	86 %
<b>GRAND TOTAL</b>	<b>355</b>	<b>33 %</b>	<b>723</b>	<b>67 %</b>	

<sup>(1)</sup> **Executive Committee (COMEX):** Represents the following employees: CEO, Chief TRansformation Officer, Chief Human Resource Officer, Branch Officers.

<sup>(2)</sup> **Senior managers:** Representing employees in cross-functional or local management roles.

<sup>(3)</sup> **People managers:** Employees responsible for managing staff.

<sup>(4)</sup> **Professional & staff:** All employees not listed above.

\***Average pay gap by gender:** Represents the average base pay of the under-represented gender compared to the average base pay of the overall category (before any cost-of-living adjustment by country). This indicator compiles data for all countries, using exchange rates as at 31/12.

As a result, it is difficult to draw conclusions about the relevance of these figures.

### Executive Committee focus

Group Executive Committee	Unit	2025	2024	Change
Members	Number	5	6	-1
French	Number	4	5	-1
Non-French	Number	1	1	-
Women	Number	1	1	-
Men	Number	4	5	-1
Average age	Years	57.1	55.5	+1.8
Average length of service	Years	11.4	9.2	+1
CEO pay to minimum wage ratio	Multiple	25.9	26.0	-0.4 %

### Employees covered by a collective agreement or company-level agreement (profit-sharing)

Country	Nb	%	Commentaires
Germany	3	100 %	
Australia	149	100 %	Profit-sharing only
Canada	4	100 %	Profit-sharing only
China	11	100 %	Profit-sharing only
United States	142	100 %	Profit-sharing only
Finland	1	100 %	
France	553	100 %	
Italy	30	100 %	
Japan	34	100 %	Profit-sharing only
Norway	1	100 %	Profit-sharing only
Poland	19	100 %	
United Kingdom	1	100 %	Profit-sharing only
Slovenia	70	100 %	
Sweden	60	100 %	
<b>GRAND TOTAL</b>	<b>1,078</b>		





### Average workforce

Average workforce	2025	2024	Variation
<b>Total average Group workforce</b>	<b>1,083*</b>	<b>1,077</b>	<b>+0.6 %</b>
of which men	730 67.5 %	719 66.8 %	+1.5 %
of which women	352 32.5 %	345 33 %	+2 %
Professional equality index - France	86	90	-4 pts
Professional equality index - Global	85	81	+4 pts

\*Employees are counted at month-end.

### Other HR data

HR data	2025	2024	Change
<b>STAFF COSTS (millions of euros)</b>	<b>72.2</b>	<b>68.7</b>	<b>+4 %</b>
Salaries and social contributions	71.3	68	+5 %
Profit-sharing / incentives	1.2	1	+17 %
Free shares	(0.3)	(0.3)	-

	Training	2025	2024	Change
Our workforce	Number of employees trained	668	705	-5 %
	Average number of training hours per employee	20.1	22.6	-9 %





### List of minimum wages by country

Country	Lumibird minimum monthly salary	Currency	No. of employees	Disclosable	Position vs country's minimum wage
Germany	-	EUR	3	No	>
Australia	5,594	AUD	149	Yes	>
Canada	-	CAD	4	No	>
China	9,000	CNY	11	Yes	>
United States	2,528	USD	142	Yes	>
Finland	-	SEK	1	No	>
France	1,871	EUR	553	Yes	>
Italy	2,313	EUR	30	Yes	>
Japan	291,667	JPY	34	Yes	>
Norway	-	NOK	1	No	>
Poland	6,500	PLN	19	Yes	>
United Kingdom	-	GBP	1	No	>
Slovenia	1,535	EUR	70	Yes	>
Sweden	29,873	SEK	60	Yes	>





## Chapter 4 Governance information

### 4.1. ROLES OF THE DIFFERENT GOVERNANCE BODIES

#### 4.1.1. Respective roles

The mission of **the Board of Directors** is to determine the Company's business strategy and oversee its implementation in accordance with its corporate interest, taking into consideration the social and environmental issues of its business. To this end, the Board of Directors analyses the relevance and feasibility of the strategic orientations (particularly in the economic, technological, financial and industrial areas) determined by the Strategy Committee of ESIRA, the leading holding company. The Board of Directors validates the conformity of the strategic orientations with the Company's corporate interest. The Board of Directors oversees their effective implementation by Executive Management.

Should the Board of Directors consider that certain aspects of the strategic orientations should be adapted or reviewed, the Board of Directors and ESIRA would carry out an assessment and make the changes they deem necessary.

The Board of Directors comprises six directors appointed by the General Meeting of Shareholders for a 6-year term. One director holds an executive position, while the other five are non-executive, including three independent directors, in line with Recommendation No. 3 of the Middenext Corporate Governance Code, to which Lumibird adheres to.

The Board of Directors implements a policy that promotes diversity of skills and experience, ensuring fair representation of all key company functions and the various markets in which the Lumibird Group operates.

Members of the Group's Board of Directors:



**Marc LE FLOHIC**

#### Learn more

- Born in 1963
- Renewed by the General Meeting on 28 April 2023
- Director
- Chairman and Chief Executive Officer

#### Experience

With a background in industry and science, he is recognised as a leading specialist in fibre laser and Lidar technologies.

After earning a PhD in physics from the University of Rennes, he began his career as a researcher at the University of Toronto in Canada, where he spent three years. During his research into laser technology, he designed lasers, amplifiers, and components based on fiber-optic technology. In 1997, he founded Optocom Innovation in Lannion, which was renamed Keopsys in 2000. In 2016, he took over the Quantel Group, whose acquisition by Keopsys led to the creation of the Lumibird Group — now a global leader in laser technology.

#### Main function outside of the Company

Chairman of ESIRA

#### Other offices

N/A

#### Skills

**Management:** General - Risk - Project - Stakeholder

**Other:** Photonics technology





**Jean-François COUTRIS**

**Learn more**

- Born in 1946
- Renewed by the General Meeting on 28 April 2023
- Permanent representative of ESIRA, Director

**Experience**

With a background in industry and defence sector.

After 10 years at the DGA as Head of Department at STCAN, and 4 years at the company Aéro working in operational research, Jean-François Coutris joined Sagem, where he held several positions including Technical and Development Director. In 2004, he was appointed Deputy CEO of Sagem and CEO of Sagem Défense Sécurité. In 2011, he retired and founded Coutris Conseil International.

**Main function outside of the Company**

Advisor to the CEO of EXOSENS

**Other offices**

N/A

**Skills**

**Management:** General - Risk - Project - Stakeholder **Other:** Photonics technology

**ESG:** Governance



**Marie Begoña LEBRUN**

**Learn more**

- Born in 1962
- Renewed by the General Meeting on 4 May 2021
- Independent Director
- Compensation Committee member
- Member of the CSR Committee

**Experience**

A graduate in physics from the Pierre and Marie Curie University and holder of a post-graduate diploma (DESS) in management, she spent 15 years in innovative SMEs in the laser and optical instrumentation sector, where she held technical sales and business development positions before joining Thales Laser in charge of after-sales services. In 2003, she founded Phasics, a spin-off of the École Polytechnique, based on the transfer of a technology invented and patented by ONERA relating to multilateral shearing interferometry. Phasics develops and markets high-resolution wavefront analysers for lasers, optical metrology, and microscopy.

**Main function outside of the Company**

Manager of MBL Consultant

**Other offices**

N/A

**Skills**

**Management:** General - Risk - Project - Stakeholder **Other:** Laser technologies

**ESG:** Environment - Social - Governance



**Gwenaëlle GRIGNON LE FLOHIC**

**Learn more**

- Born in 1967
- Appointed by the General Meeting on 3 May 2022
- Director
- Member of the CSR Committee

**Experience**

Gwenaëlle Grignon holds a degree from the Faculty of Arts in Rennes in clinical psychology, social psychology, and occupational psychology. She completed her initial education (DESS/Master's degree) with further training in business management, social security law, and labour law.

She has 30 years of experience in Human Resources, holding various positions: HR consultant, PSE (employment protection plan) project manager, senior consultant in recruitment and executive search, HR development manager in an innovative SME, and then Human Resources Director at an automotive equipment supplier.

In 2010, she founded her own consulting firm and also taught at CNAM for five years. She led the development of her firm, specialising in employment law, and became a Labour Court advisor.

She is involved in all areas of HR management (labour relations, operational project oversight) for small and medium-sized businesses in Brittany.

Since 2024, she has also been sharing her expertise as a Disability Officer, supporting managers during training sessions..

**Main function outside of the Company**

CEO of Armor RH

**Other offices**

Advisor to the Labour Court in Guingamp

**Skills**

**Management:** General - Risk - Project - Stakeholder **Other:** Recruitment

**ESG:** Environment - Social - Governance





**Marie H el ene SERGENT**

**Learn more**

- Born in 1954
- Appointed by the Annual General Meeting on 28 April 2023
- Independent Director
- Member of the CSR Committee

**Experience**

A law graduate from Panth on-Assas and former student of the Centre for European Community Studies, she began her career in publishing (Masson Group). After a role in a financial communications consultancy, she founded a financial magazine in 1987 dedicated to Finance Directors and Treasurers, and following its sale, became Head of Development at the Desfoss es Group, where she contributed to the editorial repositioning of the daily newspaper L'AGEFI.

Driven by a strong commitment to promoting the French financial centre, she played an active role in the creation of Europlace, to which she dedicated numerous publications.

In 1995, she founded SHAN, a corporate and financial communications consultancy with a strong track record in the financial, agri-food, tech and energy sectors.

Advising companies with their consolidation operations: Euronext Credit Agricole, Altran, Veolia.

Crisis communications specialist.

**Main function outside of the Company**

Founder and Chairman of SHAN

Member of the Mesnard Catheau Strategy Committee

Founder and member of Club Jorasses

Municipal councillor.

**Other offices**

Chairman of the board of Shan Holding and Erebor

**Skills**

**Management:** General - Risk - Project - Stakeholder **Other:** Communication

**ESG:** Environment - Social - Governance



** tienne de LASTEYRIE**

**Learn more**

- Born in 1978
- Appointed by the General Meeting of 29 April 2024
- Independent Director
- Chairman of the Audit and Compensation Committee
- Member of the CSR Committee

**Experience**

He joined Ricol Lasteyrie in 2003 as part of the Financial Expertise department, before focusing exclusively on financial strategy and creating the Corporate Finance department. He has advised numerous family-owned businesses on external growth and funding strategies. Following the sale of Ricol Lasteyrie to international firm EY in 2015, he became a partner and joined the executive committee of EY's Transaction Advisory Services division in France. Following his departure from EY in 2019, he founded Lasteyrie & Associ es and has since been developing valuation services (independent valuation and party assistance) and consulting (M&A and financing) activities for mainly family-owned groups.

**Main function outside of the Company**

Director of Lasteyrie & Associ es and Chairman & Director of various associated companies.

**Other offices**

Director of CCV BEAUMANOIR (unlisted French SA).

**Skills**

**Management:** General - Risk - Project - Stakeholder **Other:** Finance

**ESG:** Environment - Social - Governance





### Board Committees

The Board has set up several specialised committees to support its work and help prepare its meetings. The Board of Directors then makes the final decisions on the matters in question.

The main tasks and responsibilities of each Committee are set out in the Board of Directors' Internal Rules. The members of the Board's Committees, including their chairs, are appointed by the Board of Directors from among its own members.

The Internal Rules are updated and approved by the Board of Directors as necessary.

#### Audit Committee

The Board of Directors decided to adopt the exemption applicable under Article L.823-20, 4 of the French commercial code. As a result, the Board of Directors meets as an Audit Committee to perform the missions assigned to this Committee under Article L.823-19 of the French commercial code.

When it meets as the Audit Committee, the Board of Directors' missions include monitoring:

- The process for drawing up financial information;
- The efficiency and effectiveness of the internal control and risk management systems;
- The statutory audit of the annual financial statements and, if applicable, the consolidated financial statements by the Statutory Auditors;
- The Statutory Auditors' independence;
- The approval of the provision of services by the Statutory Auditors other than the certification of the financial statements.

#### Compensation Committee

The Compensation Committee meets at least once a year and has a mission to:

- Review the executive compensation policies applied by the Company and provide any advice. Within this framework, the Compensation Committee is called upon to:
  - Check the criteria for determining fixed and variable compensation for executives;
  - Assess each executive's performance and propose their compensation;
  - Review the stock option and free share plans, plans based on changes in the share's value, and retirement and benefits plans.
- Submit recommendations and proposals to the Board of Directors concerning:
  - All the items of compensation, the retirement and benefit plans, the benefits in kind and other financial entitlements, including in the event of the termination of their activity, for the Company's executives;

- The amount and conditions for the distribution of the overall compensation package to be allocated to directors;
- The awards of stock options and free shares for executive officers.

#### CSR Committee

The Board of Directors, during its meeting of 24 September 2024, updated the Board of Directors' Internal Rules and their appendices to reflect the transposition of the CSRD directive into French law. At its meeting on 4 June, the CSR Committee proposed that the sustainability-related responsibilities set out in Article L.821-67, 1° to 7 of the French Commercial Code should be undertaken by the CSR Committee rather than by the Board acting as the Audit Committee.

This committee is in charge of the following tasks:

- Monitor the effectiveness of the internal control and risk management systems and, where applicable, internal audit, regarding procedures for preparing and processing accounting, financial, and sustainability-related information, including in digital format;
- Issue a recommendation on the statutory auditors (or independent third-party body) proposed for appointment by the General Meeting or equivalent governing body;
- Monitor the performance of assignments carried out by the statutory auditors (or independent third-party body) and the certification of sustainability-related information;
- Ensure that the independence requirements applicable to those involved in certifying the financial statements and sustainability information are met.

In addition, the Board of Directors appointed at least one independent member with specific expertise in financial, accounting or statutory audit matters, namely the Chair of the Audit Committee.

**FOR MORE INFORMATION ON GOVERNANCE, PLEASE REFER TO CHAPTER 2, SECTION 1, §1 OF THE UNIVERSAL REGISTRATION DOCUMENT.**

#### 4.1.2. Expertise of the various governance bodies

In addition to their expertise (see above), the Committee members received training on sustainability as early as 2022, by attending sessions as part of the three-year training plan.

In addition, the Executive Committee regularly monitors the work of the responsible teams. Some members of the Executive Committee are also designated as leads (owners/ sponsors) for specific CSR strategy topics.

The Executive Committee is supported by other internal functions in monitoring and managing ESG issues.





## 4.2. CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES

### 4.2.1. Foundations

Unethical behaviour or misconduct by our employees or suppliers may negatively impact our business and potentially expose us to legal, operational and reputational risks. As a result, we require our conduct to align with our Code of Conduct and Supplier Purchasing Policy, which set out clear standards for all our operations and outline the expected behaviour of our employees, business partners and suppliers.

These policies are supported by standalone policies, such as those relating to whistleblowing, personal data privacy, and our statement on combating modern slavery.

This set of policies covers a range of areas and sets out our position and approach to key topics, in particular corruption and bribery, and the management of supplier relationships.

Where local laws and regulations differ from the standards set out in our Code of Conduct, the stricter standard must always be applied.

By acting in accordance with these Policies, we ensure fair, transparent and legal business operations while mitigating risks to our company.

Where deemed necessary, General Management reviews and updates the policies, taking into account the outcomes of due diligence processes, including in response to any material IRO identified within the value chain.

### 4.2.2. Code of conduct

The Group does not tolerate any forms of corruption or bribery, including extortion and payoffs, aimed at obtaining a commercial advantage for its business, and is committed to ensuring compliance with the laws in force in all the countries where it operates.

In 2025, the Code of Conduct, which deals in particular with the prevention and detection of corruption, was updated. It summarises the Group's commitments and principles in this area and defines the different types of behaviour to be avoided, which could constitute an act of corruption. It applies to all employees, the Executive Committee, and the Board of Directors.

In addition, employees can now call on the Group's Compliance Committee if they become aware of situations or practices that contradict the rules. The Group has also set up a whistleblowing system in accordance with the European Directive 2019/1937 of 23 October 2019 on the protection of whistleblowers, which can be accessed via an external web platform, by telephone or via the Group's HRIS platform.

The Code of Conduct and the whistleblowing system reflect the Group's commitment to preventing and detecting corruption. They apply to all employees and Directors, regardless of the country in which Lumibird operates.

They aim to:

- Maintain a healthy corporate culture with high levels of integrity by providing guidance to all employees on

expected behaviour and how to interact with stakeholders;

- Define the appropriate course of action in the event of any breach of the established rules;
- Ensure the protection of employees who initiate a report.

The Code of Conduct incorporates several international guidelines, such as the US Foreign Corrupt Practices Act and other applicable local legislation.

It became apparent that the Group's policy regarding the conduct expected of employees in relation to confidentiality and competition needed to be strengthened. Consequently, the Code of Conduct was updated in 2025 to include these two additional areas.

The risks covered by our Code of Conduct are:

- Corruption;
- Influence peddling;
- Facilitation payments;
- Gifts and hospitality;
- Conflicts of interest;
- Fraud;
- Competition;
- Confidentiality and asset protection;
- Sponsorship and patronage; and
- Political party financing.

### 4.2.3. Exposed population

#### 4.2.3.1. Identification of employees in risk-exposed roles

To mitigate risks, maintain a high level of integrity and ensure full compliance with the laws of the countries in which the Group operates, we focus primarily on employees in roles with the highest risk exposure. In this context, specific roles directly involved in critical financial transactions, interactions with external stakeholders, or requiring mastery of applicable regulations and adherence to a shared ethical framework are prioritised. At Lumibird, the roles identified include those within the Procurement and Finance departments, the Finance department, in commercial or managerial roles, or operating in specific high-risk markets.

#### 4.2.3.2. Employee training

##### 4.2.3.2.1. Training and access to documentation

To ensure proper implementation of the Code of Conduct and the whistleblowing system, the Group conducts regular training campaigns.

In addition, these policies are made available on the Group's intranet server and the HRIS platform.

##### 4.2.3.2.2. Training rates

As at 31 December 2025:

- 47% of staff have completed anti-corruption training, specifically covering fraud, gifts and the whistleblowing procedure;
- 63% of staff have completed training to raise their awareness of data security and protection (whether relating to know-how, confidential information, personal data, etc.).





#### 4.2.4. Mechanism for identifying and handling reports

##### 4.2.4.1. Identification of breaches

It is the responsibility of every Group employee to raise an alert if they become aware of serious misconduct or behaviour that violates the Code of Conduct or applicable laws.

To submit a report, Lumibird employees have access to an external website where they can either leave a message or be connected to a voice server. Anonymity of the process and its follow-up is ensured via a unique ID and access code provided at the end of the session.

##### 4.2.4.2. Handling reports

The compliance committee responsible for handling reports has 7 working days to acknowledge receipt of an alert. Within a maximum of 3 months and 7 working days, it informs the whistleblower of the action it intends to take in response to the report and, depending on the unlawful nature of the breach identified, decides whether to forward the report to the competent authorities.

##### 4.2.4.3. Whistleblower protection

The confidentiality of the identity of the whistleblower, the individuals concerned and any third parties involved in the report will be guaranteed, including by the Compliance Committee during its review. Accordingly, any information

that could lead to the identification of the whistleblower must not be disclosed without their prior consent, except when referred to the judicial authorities. In such cases, they must be informed of the process.

In addition, in accordance with applicable legislation, protection also extends to any natural or legal persons who assist the whistleblower in disclosing the reported facts, and protects them against any potential retaliation.

##### 4.2.4.4. Composition of the Compliance Committee

The Compliance Committee is composed of:

- The Group's Human Resources Director; and
- Its Legal and Compliance Director.

#### 4.2.5. Allegations

In 2025, Lumibird did not identify any behaviour within the company that breached the rules set out in its Code of Conduct, nor any attempted acts of external corruption.

Furthermore, during the same period — as in previous years — the Group did not receive any allegations from external stakeholders concerning potential practices that may have breached the laws applicable to its activities. Under these conditions, Lumibird was not subject to any convictions for violations of anti-corruption or anti-bribery laws and, as a result, no fines were imposed.





## 4.3. MANAGEMENT OF SUPPLIER RELATIONSHIPS

### 4.3.1. Context

In order to be able to manufacture its products, Lumibird calls on third-party suppliers, in particular so that it can procure specific components, such as laser rods or certain specific optical fibres.

To protect itself against a risk of dependency for those critical components the Group uses, to the extent possible, at least two suppliers, in order to be able to negotiate prices and deal with any default by either supplier.

Similarly, Lumibird pays close attention to the quality of purchased components, not only to reduce the risk of product recalls but also to build strong relationships with its clients and foster customer loyalty.

The main challenges for the Group, linked to the choice of its suppliers, are therefore:

- Preventing a single-source supply from making the Group dependent on the financial health of a supplier, the quality of its products, or the political or health stability of the country where that supplier is located;
- Designing modular products, able to work with different critical components of various origins, while maintaining the required level of excellence;
- Ensuring a responsible purchasing policy under which suppliers commit to complying with respecting human rights and environment, in accordance with the sustainable development goals n°5, 6, 8, 9, 10, 12, 13, 15 and 16 of the United Nations.

To achieve this, the Group evaluates its suppliers in line with ISO 9001 recommendations and requires them to provide certificates of compliance with REACH, RoHS, and CMRT (restricting the use of toxic, hazardous or rare substances), and to commit to respecting human rights and effectively combating modern slavery.

### 4.3.2. Procurement policy

To guard against the risks resulting from its business model, the Group's procurement policy is based on a

multifaceted approach, aimed at not only securing its supplies, but also reducing its costs, in line with ethical and sustainable practices. To ensure reliable long-term sourcing in line with the expected technical specifications, it has set itself objectives to:

- Further strengthen its sourcing strategy for sensitive components;
- Promote and encourage the optimisation of purchases through open, wide-ranging and impartial competitive tendering;
- Promote the development of a high-performing and reliable supplier base;
- Reduce procurement costs by leveraging Lumibird's buying power with volume orders for the entire Group;
- Contribute to the achievement of Lumibird's strategic objectives relating to the improvement and alignment of management processes;
- Establish sound and ethical buying practices by applying the principles of full lifecycle costs and minimising adverse environmental and social impacts through the selection of sustainable goods and services;
- Deploy a responsible approach over the long term, choosing committed suppliers who share our values.

It has been in force throughout the group since January 2022.

In addition, the Group has drawn up a policy, available on its website, based on a rigorous selection process for its suppliers and stakeholders, as well as on certificates confirming that these suppliers and stakeholders comply with the general principles of respect for human rights and the fight against slavery and forced labour.

As part of this, our Swedish subsidiary has implemented a Supplier Code of Conduct.

Also, the selection of new suppliers may, where applicable, involve ensuring that they meet certain sustainability criteria defined by the Group's Finance Department, Procurement Department, and the relevant Sales Department. It may also be considered necessary to conduct a background review of a supplier in order to identify any sustainability-related impacts or financial risks linked to the supplier's role in the supply chain.





## Chapter 5 Policies adopted to manage ESG issues

Our policies are in place to prevent, mitigate and address actual and potential impacts, manage risks and seize opportunities. Our policies are updated and reviewed as and when necessary.

Topics	Group policy	Description	Availability	Recommendations and laws
Governance	Code of conduct	<ul style="list-style-type: none"> <li>Prohibits corruption and complies with anti-corruption laws</li> <li>Prohibits influence peddling and facilitation payments</li> <li>Sets out the policy on gifts and hospitality</li> <li>Describes situations involving conflicts of interest</li> <li>Prevents instances of fraud and unfair competition</li> <li>Reiterates the obligation of confidentiality and asset protection</li> <li>Sets out the policy on sponsorship and patronage</li> <li>Prohibits the funding of political parties</li> <li>Ensures the highest standards of ethical conduct</li> <li>Violations are reported through various channels, including the anonymous whistleblowing system</li> </ul>	Company Intranet Group HRIS	The 'Sapin II' Act No. 2016-1691 of 9 December 2016 (anti-corruption legislation) Act No. 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers (amending Sapin II). European Directive 2019/1937 of 23 October 2019
Governance	Whistleblowing system	<ul style="list-style-type: none"> <li>Violations are reported through various channels, including the anonymous whistleblowing system</li> <li>No reprisals are taken against individuals who report violations in good faith</li> <li>Compliance with data protection regulations.</li> </ul>	Company Intranet Group HRIS	The 'Sapin II' Act No. 2016-1691 of 9 December 2016 (anti-corruption legislation) Act No. 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers (amending Sapin II). European Directive 2019/1937 of 23 October 2019  The local law of any country where the procedure is to be applied
Social and Governance	Modern Slavery Statement	<ul style="list-style-type: none"> <li>Respects human and labour rights: prohibits forced labour, child labour and human trafficking.</li> </ul>	Websites	Conventions OIT





Topics	Group policy	Description	Availability	Recommendations and laws
Environment, Social and Governance	CSR policy	<ul style="list-style-type: none"> <li>Support our clients over the long term and build a resilient economic ecosystem through responsible innovation</li> <li>Foster loyalty, motivation and the development of our employees through a virtuous strategy</li> <li>Building strong, lasting partnerships with suppliers who share our values</li> <li>Become a responsible corporate citizen and build a sustainable operating model</li> </ul>	Group Intranet	Directive (EU) 2022/2464 on corporate sustainability reporting United Nations Sustainable Development Goals
Social	Human Resources Policy	<ul style="list-style-type: none"> <li>Promotes anti-discrimination and anti-harassment standards</li> <li>Ensures a safe and healthy working environment by complying with health and safety laws</li> <li>Implements procedures to prevent risks and accidents</li> <li>Promotes a respectful, inclusive and safe working environment</li> <li>Promotes social dialogue</li> <li>Ensures equal opportunities for all</li> <li>Recognises and respects individual identities</li> <li>Promotes equal rights and non-discrimination</li> </ul>	Group HRIS	ILO Conventions United Nations Sustainable Development Goals
Social	Human Resources Privacy Policy	<ul style="list-style-type: none"> <li>Prioritises confidentiality and data protection in accordance with applicable laws</li> <li>Ensures the protection and confidentiality of employee information</li> <li>Defines the collection, use, storage and security of personal data</li> <li>Complies with applicable data protection laws</li> <li>Protects employee privacy</li> <li>Complies with the highest standards of data security</li> </ul>	Group HRIS	General Data Protection Regulation 2016/679 of 27 April 2016





Topics	Group policy	Description	Availability	Recommendations and laws
Governance	Privacy policy	<ul style="list-style-type: none"> <li>▪ Prioritises confidentiality and data protection in accordance with applicable laws</li> <li>▪ Defines the collection, use, storage and security of personal data Complies with applicable data protection laws</li> <li>▪ Complies with the highest standards of data security</li> <li>▪ Respects intellectual property protection</li> </ul>	Websites	General Data Protection Regulation 2016/679 of 27 April 2016
Social Governance	IT Charter	<ul style="list-style-type: none"> <li>▪ Help preserve the security of the Group's information system,</li> <li>▪ Ensure that any usage is in full compliance with all applicable laws and regulations</li> <li>▪ Covers: the general rights and responsibilities of the user, the security rules, the rules for personal use and the monitoring measures</li> </ul>	Group Intranet	General Data Protection Regulation 2016/679 of 27 April 2016
Environment Governance	Procurement Policy	<ul style="list-style-type: none"> <li>▪ Establish sound and ethical purchasing practices by applying full life-cycle costing principles and minimising negative environmental and social impacts by selecting sustainable goods and services.</li> <li>▪ Promote and encourage procurement optimisation through open, broad, and impartial competition.</li> <li>▪ Promote the development of a reliable and efficient supplier base capable of delivering technically compliant products and services at good value for money.</li> <li>▪ Reduce purchasing costs by leveraging Lumibird's buying power by consolidating procurement volumes across the Group.</li> <li>▪ Contribute to the achievement of Lumibird's strategic objectives by improving and aligning management processes.</li> </ul>	Group Intranet	ISO 9001



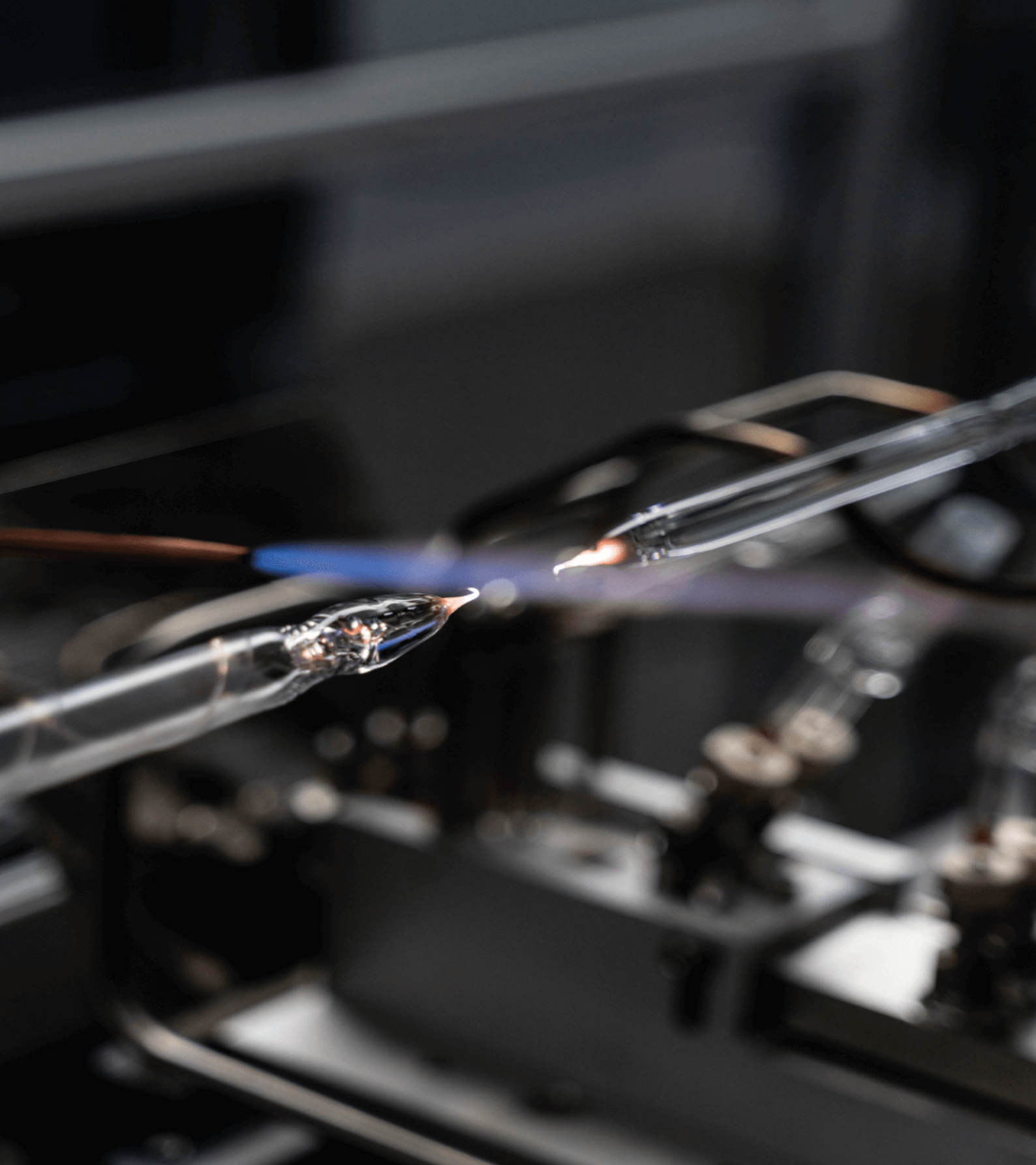


Topics	Group policy	Description	Availability	Recommendations and laws
Environment Governance	Quality policy	<ul style="list-style-type: none"> <li>▪ Improve Lumibird's performance to meet the needs and expectations of our clients, employees, suppliers and shareholders.</li> <li>▪ Innovation: Optimisation of our R&amp;D organisation for the development of new markets (new products and applications)</li> <li>▪ Performance: Improve our organisational efficiency and develop inter-site synergies</li> <li>▪ Reliability: Continuously improve our products, and control our production/ manufacturing processes and activities with external suppliers</li> <li>▪ Competence: Improve skills through annual performance and development reviews and by implementing a training policy</li> </ul>	Group Intranet	ISO 9001 ISO 13485 MDSAP

Policies may be implemented at the local level, but the Group policy applies at all times throughout the Group. However, the stricter standard must always apply where local laws and regulations differ from the standards set out in our Code of Conduct.







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